

# West Petersville #1 Timber Sale

## Comments & Responses

Department of Natural Resources, Division of Forestry  
January 2006

The following comments were received during the public comment period on the West Petersville #1 Timber Sale.

Organization	Author	Location
	Geoffrey Parker	Anchorage
	Mr. & Mrs. James Denison	Long Beach
	Richard Leo	Trapper Creek
	Krister Bowman	
Easley Associates	Paula Easley	
	Brian & Diane Okonek	Talkeetna
	Becky Long	Talkeetna
	Sandra White	Talkeetna
	Sandy Kogl	Talkeetna
	Denis Ransy	Talkeetna
	John Strassenburgh	Talkeetna
	Kenneth Marsh	Trapper Creek
	Joe Bovee	Wasilla
Trapper Creek Community Council	Burnu Watkins	Trapper Creek
Matanuska-Susitna Borough Planning Division	Murph O'Brien	Palmer
	Ruth Wood	Talkeetna
Resource Development Council	Carl Portman	Anchorage
Alaska Forest Association, Inc.	Owen Graham	Ketchikan
Friends of the Mat-Su	Kathy Wells	Palmer
	Arthur Mannix	Talkeetna
	Dave Johnston	Talkeetna
	Rick Ernst	Trapper Creek
Office of Habitat Management and Permitting	Mike Bethe	Palmer
	Sheryl Salasky	Talkeetna
Alaska Moose Federation	Gary Olson	Anchorage
Alaska Village Initiatives	Charles Parker	Anchorage
Cascadia Wildlands Project	Gabriel Scott	Cordova

**Abbreviations**

ADFG: Alaska Department of Fish and Game

BMPs: Best Management Practices

DBH: diameter at breast height

DEC: Department of Environmental Conservation

DNR: Department of Natural Resources

DOF: Division of Forestry

FF: Final Finding (Forest Land Use Plan)

FLUP: Forest Land Use Plan

FRPA: Alaska Forest Resources and Practices Act

FYSTS: Five Year Schedule of Timber Sales

OHMP: Office of Habitat Management and Permitting

PD: Preliminary Decision (Forest Land Use Plan)

SHPO: State Historic Preservation Office

SFG: Susitna Forestry Guidelines

## General response to comments

Changes made. In response to comments, added parts of this section to a new section of the FLUP: E. Planning Framework.

The decision to offer the West Petersville #1 Timber Sale was based on a long series of planning decisions, made with public input every step of the way. The most recent document, the Forest Land Use Plan (FLUP) for the timber sale, is one of the final steps in this long planning process. The planning for where timber harvest is appropriate, and where it is not appropriate, is done at a much broader scale than the FLUP. The framework for how management decisions are made for timber sales in the Susitna Valley is as follows:

1. Area plans and land use plans (in this case, the *Susitna Area Plan*) determine where timber harvesting is allowed.
2. The *Susitna Forestry Guidelines* and the Forest Resources and Practices Act and Regulations determine how timber will be managed.
3. General decisions on when timber sales will be held and how big each sale will be are made through the Five Year Schedule of Timber Sales.
4. Next, a Forest Land Use Plan is written for each individual sale, which contains more detailed decisions about each sale.

1. The *Susitna Area Plan* (June 1985) is the broad-scale analysis of the types of land uses appropriate on different areas of state land in the Susitna Valley. The *Susitna Area Plan* covers approximately 15.8 million acres in southcentral Alaska. The Susitna Area planning process was the means to openly review resource information and public concerns prior to making long-range decisions about public land management. The planning process determined how the complete range of uses would be accommodated in the Susitna Area, including opportunities for forestry, as well as protecting fish and wildlife habitat, opportunities for recreation, and the whole range of other uses.

Over three-quarters of the public lands in the Susitna planning area are retained in public ownership and managed for multiple use, including protection of fish and wildlife habitat and provisions for hunting, fishing, and other wildlife use opportunities. Habitat protection and management is a primary use on over 90% of retained public lands and a secondary use on the rest (e.g., small recreation sites). Forestry is an allowed use on a much smaller part of the planning area: only 464,000 acres of the total 15.8 million acres. Significant areas are closed to uses that would be incompatible with fish and wildlife habitat values.

2. Forestry activities in the Susitna Valley are also governed by the *Susitna Forestry Guidelines (SFG)* (December 1991), a document developed through a second broad-scale public planning process. The *SFG* establishes specific guidelines for forestry lands in the Susitna Valley. It was designed to provide a balanced, sustained yield of public benefits, including providing wood for personal and commercial use, supporting tourism and recreation opportunities, protecting and enhancing fish and wildlife habitat, and protecting air, land and water quality. The *SFG* states that “to provide wood, fish, game, recreation, and other benefits, state-owned forest lands will include both natural ecosystems and actively-managed forests.”

The *SFG* provides for harvest, while at the same time protecting other resources and uses. For example, even in lands classified to allow forestry activities, timber harvest is prohibited near lakes and most wetlands and streams, along the Iditarod Trail, near bald eagle nesting sites, recreation sites, and within 300 feet of the Petersville Road.

3. Next, the Division of Forestry prepares a Five-Year Schedule of Timber Sales (FYSTS) every other year. The Schedules give the public, timber industry, and other agencies an overview of the division's plans for timber sales. They summarize information on proposed timber harvest areas, timber sale access, and reforestation plans. Five-Year Schedules are subject to public and agency review. The review helps identify issues that must be addressed in detailed timber sale planning. After review and revision, DNR uses the schedules to decide how and where to proceed with timber sale planning.

Finally, the Forest Land Use Plan (FLUP), which you have commented on, is prepared. The FLUP presents detailed information on the location, access, harvest methods, duration, and proposed reforestation for each sale. The public is asked to comment at this stage, as well. By getting the best available data, combined with a series of public processes that helps us gather information from the public and other agencies, we make well-informed decisions about uses of resources on state land.

For this specific timber sale, the West Petersville #1 Timber Sale, the decision to allow timber harvest in the area was made in the *Susitna Area Plan*. The sale area is within Management Subunit Petersville Road 1a of the *Susitna Area Plan*, and the timber road crosses Subunit 3a. Subunit 1a, Peters Creek, has primary co-classifications of forestry, public recreation, water resources, and wildlife habitat. The management intent states: “Provide for long term multiple use management for timber, habitat, public recreation, and

other uses that are compatible with these activities.” Subunit 3a, Gate Creek-Amber Lake, has primary uses of public recreation, water resources, and wildlife habitat, and forestry is designated as a secondary use. The management intent for both units specifically allows for timber harvest.

### **Public Notice**

Five Year Schedule of Timber Sales. The Petersville #1 Timber Sale was included in the DOF’s Mat-Su Southwest Area and Kenai-Kodiak Area Five Year Schedule of Timber Sales, 2005-2009. The Schedule was published in January 2005 and noticed for public comment in the *Frontiersman* on February 4 and 7, and in the *Anchorage Daily News* on February 17 and 20. The notice was posted in all Mat-Su post offices and on the State of Alaska Public Notice and the DOF web sites. The notice was also sent to agencies, Mat-Su community councils, tribal councils, Native corporations, planning commissions, Legislative offices, conservation groups, small mill operators, timber industry representatives, and private citizens. An interview regarding the FYSTS was given to the local radio station KTNA on February 23, 2005. The schedule and maps are available for download from the DOF’s web site. Public comments were accepted until March 7, 2005, but comments received after March 7 were kept in the file. Twenty-nine comments were received. These public comments were used to identify issues that would be addressed in the Forest Land Use Plans.

The DOF held an Open House and Forestry Presentation on March 31, 2005 at the Willow Community Center and April 8, 2005 at the Trapper Creek Elementary School. Both of these events were advertised as a public service announcement through the KTNA Public Radio Station, as well as in the *Talkeetna Times* and *Frontiersman* newspapers. The Trapper Creek event was attended by 13 people and received two comments and two requests for hardcopies of the Five Year Schedule of Timber Sales. The Willow presentation was attended by six people and no comments were received.

Forest Land Use Plan. The West Petersville #1 Timber Sale Forest Land Use Plan (FLUP) Preliminary Decision was published in October, 2005 and noticed for public comment in the *Frontiersman* and the *Anchorage Daily News* on October 14 and 21, 2005. The notice was posted in all Mat-Su post offices and on the State of Alaska Public Notice and the DOF web sites. The Notice was also sent to agencies, Community Councils, tribal councils, native corporations, planning commissions, Legislative offices, conservation groups, small mill operators, timber industry representatives, and private citizens. According to the *Susitna Forestry Guidelines*, landowners within a quarter-mile of the proposed sale boundary must be notified, but there are no private landowners within that distance of the timber sale. The FLUP and maps are available for download from the DOF’s web site. Public comments were accepted until November 14, 2005. Comments received after November 14 were also kept in the file. Twenty-eight comments were received.

The comments we received on the Preliminary Decision, or FLUP, have been incorporated into our Final Finding, the final draft of the Forest Land Use Plan. We have responded to individual comments in the following table. Changes to the FLUP that have been added to the Final Finding are noted in the “Responses” column.

### **Multiple Use**

Because so much of the Susitna Valley was classified in the *Susitna Area Plan* for multiple uses (e.g., habitat, forestry, recreation, water resources), the *Susitna Forestry Guidelines* were developed to clearly define how timber harvest would be done to protect the other uses. The *SFG* recognizes the importance of non-timber values in the area, and protects them while providing access to timber resources. This sale complies with the *Susitna Forestry Guidelines*.

Commenter	Comment	Response
	<b>General Support</b>	
AFA, Owen Graham	<p>We encourage you to offer the West Petersville #1 Timber Sale as soon as possible. Additional timber sales should be made available for operators in this region as well. Several of the operators in the area have long complained that there are inadequate green timber sales being offered.</p> <p>It is essential to have a timber sale program that will sustain these operators in the long term in order to support the businesses and the jobs that are associated with those businesses. A long-term supply is also essential to secure financing investments in the timber industry.</p>	Comment noted.
RDC, Carl Portman	<p>The Resource Development Council for Alaska (RDC) is writing to express its support for the West Petersville #1 Timber Sale.</p> <p>...</p> <p>The West Petersville #1 Timber Sale is in the best interests of the State of Alaska and the Matanuska-Susitna Borough. RDC strongly encourages the Division of Forestry to move forward with the sale.</p>	Comment noted.
Joe Bovee	My family and I strongly urge the State of Alaska DNR to go forward with this timber sale and continue on with the Five-Year Schedule of Timber Sales. We believe the objectives provided in the Forest Land Use Preliminary Decision packet are needed for the reasons stated and are a win-win situation for the local economy.	Comment noted.
Alaska Village Initiatives, Charles Parker	I am writing in support of the proposed West Petersville Timber Sale. The proposed sale would not only provide important economic activity in the region, but would also support local business development in the Mat-Su Borough.	Comment noted.
Easley Associates, Paula Easley	I am writing to express my strong support for the state timber sale in the Matanuska-Susitna Valley to provide raw materials for local chip manufacturing, to foster forest regeneration and to enhance wildlife habitat. I also look forward to future sales that will assure long-term supplies and add to Alaska's employment opportunities.	Comment noted.
Mat-Su Borough	<p>We agree that alternative action number 1 is the preferred alternative, subject to the inclusion of these comments [see Borough comments under specific issues, below]</p> <p>This alternative continues the sale as proposed.</p>	Comment noted. See responses to individual issues, below.
	<b>Anadromous fish</b>	
RDC	RDC believes this sale will not only benefit the timber industry and the Mat-Su economy, but will also contribute to healthy forest regeneration and enhance wildlife habitat: the sale area will have a no-cut 300-foot stream management reserve area,	Comment noted.

Commenter	Comment	Response
OHMP, Mike Bethe	<p>and all cutting units will be 50 acres or less in size, pursuant to the <i>SFG</i>.</p> <p>The Office of Habitat Management and Permitting believes that the FLUP Preliminary Decision for the West Petersville #1 sale adequately addresses the protection of fish and wildlife and fish and wildlife habitats provided the following recommendations are incorporated into the final Forest Land Use Plan:</p> <ul style="list-style-type: none"> <li>• The proposed locations for all stream crossing should be clearly marked on all maps.</li> <li>• In order to protect water quality and fish habitat, the overlying vegetation adjacent to all waterbodies should <b><u>not</u></b> be removed to facilitate the construction of temporary winter roads.</li> <li>• Prior to placing any culverts or designing any water crossings, the OHMP will be contacted to determine the presence or absence of fish and/or the need for a Fish Habitat Permit.</li> </ul> <p>OHMP appreciates the opportunity to work closely with the DOF and comment on pending Forest Land Use Plans and timber harvest DPO's.</p>	<p>During intensive reconnaissance of the sale area, the Division of Forestry has found additional non-catalogued streams contiguous to cataloged anadromous fish-bearing streams. The DOF will not allow logging within 100 feet of these streams and will treat these streams as described in the FLUP in Section D, Fisheries and Water Quality. These guidelines include: 1) the DOF will not allow logging within 300 feet of cataloged anadromous fish streams, and 2) DOF will not allow logging within 100 feet of streams that are contiguous with cataloged streams and show evidence or indications of anadromous or high value resident fish as per the FRPA.</p> <p>All known streams and crossing locations are shown on the map accompanying the final decision.</p> <p>The Division will follow the FRPA and incorporate its best management practices concerning the construction of temporary winter roads, stream crossings, and ice bridges to minimize creek disturbance and fish passage.</p> <p>The Division will contact OHMP to do a site visit prior to the construction of creek crossings to best implement the best management practices for this sale.</p>

Commenter	Comment	Response
Geoffrey Parker	<p>Northern pike have infested the lakes and streams on the west side of the Susitna River and have eradicated rainbow trout in some of the systems designated for special management, such as Alexander Creek, and also about 100 lakes on the west side of the Susitna. However, this proposed sale (unlike other sales currently proposed by your office in the Division of Forestry), affects access to the trout populations on the west side of the Susitna, in Moose and Kroto Creeks and the Deshka River, where pike complicate matters. The preliminary decision needs to address that issue. Generally, catch and release has about a 5% mortality rate, such that increased pressure increases mortality. Given that trout are facing pike-related mortality issues in the Susitna drainage, and numerous extinctions of trout populations there have occurred already, the state does not need to add to the pressure by sales such as this.</p> <p>On top of that, the preliminary decision concedes that increased access by off-road vehicles on winter road routes will occur and that roads will “not be capable of supporting sustained all-season off-road vehicle traffic without causing erosion.” Hence, erosion into salmon and trout waters seems likely. The preliminary decision does not even state a requirement for an amount of snow cover. These issues, like those related to pike and trout, are totally missed in the preliminary decision on this sale.</p> <p>...</p> <p>Finally, even if the preliminary decision were to become “final,” there is an untidy issue of whether it would be fully final. That is because the document states “all streams with connectivity to the cataloged [anadromous] streams will be buffered per FRPA, <i>unless OHMP indicates that the stream is a non-fish bearing drainage.</i> (Emphasis added.) Because OHMP has yet to make such determinations, the preliminary decision, if it were to become final, would not be “final” for all purposes, because OHMP still would have decisions to make. That appears to create problems for everyone involved—e.g., for DNR/DOF’s calculation of timber volumes and receipts, for prospective bidders, and for the public. In other words, the DOF is contemplating a “final” decision that would be “almost final” but “not really final.”... When does the record for appeal become final, and when do I have to file my “final” comments? You would be wise to withdraw this proposed sale and straighten such matters out.</p>	<p><u>Northern pike.</u> The Alaska Department of Fish and Game’s Sport Fish Division manages the trout fishery in the area conservatively with no retention of rainbow trout allowed upstream of the confluence of the Moose and Kroto Creeks. Due to this conservative management, the Sport Fish Division believes that any increased access will have negligible effect on the local trout fishery.</p> <p><u>ATV use.</u> Currently, ATVs access the sale area off of the Petersville Road approximately 1.5 miles west of the DOF’s proposed route. The ATV trails cross both uplands and wetlands, with most of the ATV activity occurring in the fall during the hunting season. DOF’s proposed route uses an old winter logging road for the first half mile, which presently shows little to no use by ATVs. The road’s use is probably limited by a stream crossing the road at about a half mile from the Petersville Road that would be difficult for ATVs to cross during non-winter months.</p> <p>Winter roads and ice bridges will be used to access the sale. The stream will not have a year-round crossing, so the stream will continue to limit ATV access. As stated in the Transportation section of the Forest Land Use Plan, after timber harvest activities are completed, all roads constructed for this sale will be closed. The closure will meet the standards in 11 AAC 95.320, which requires the road be blocked so four-wheeled highway vehicles cannot pass. Since the road will be blocked to highway vehicles and the stream limits ATV access, access will be the same as it was prior to harvest. See also responses to comments in the “Road closure and ATV use” section, below.</p>
Brian and Diane Okonek	<p>To best protect anadromous fish habit it would be most prudent to leave buffers along all feeder streams no matter their size or potential as fish habitat. This is will ensure that sediment does not enter anadromous fish streams and it helps to keep water temperatures in the streams from becoming too warm. Leaving buffers along all streams would eliminate the need to have to remove logging debris from stream channels, which would damage stream edges.</p>	<p><u>Erosion into surface waters.</u> AS 41.17.115 and 11 AAC 95.185 charge the DOF with maintaining the existing surface water quality conditions during timber harvest operations. The DOF, through the timber sale contract, will apply the Forest Resources and Practices Act and regulations to field conditions to mitigate sediment</p>

Commenter	Comment	Response
Sandra Kogl	Protecting wildlife habitat, especially salmon streams, should have a top priority, regardless of the size of the timber sale. Our salmon are facing increasingly difficult challenges and should not be further impacted by logging operations. Ample buffers along streams and carefully engineered crossings should be in place for all logging near anadromous fish streams.	movement to surface waters in the sale area. Harvest operations will cease or change if surface water quality is at risk. The amount of snow cover or frost depth required for sale operations to effectively achieve this will be mandated in the timber sale contract. This typically is stated as one foot of snow or six inches of frost. Whether the conditions are acceptable for winter harvest depends on several factors, including temperature history, depth and type of vegetative cover, snow type, and yarding methods.
Denis Ransy	Logging is notoriously hard on streams. Your promises of compliance and high water quality do not really reassure me. Hundreds of passes by trucks and heavy equipment pushes a lot of material around, and crushes a lot of vegetation. As this is a winter show, what would happen if there is not a strong freeze-up? There would be a lot of pressure from the loggers to get in there—how frozen is frozen enough? I’ve heard of many a cat sinking into ponds and bogs, even in winter.	<u>Anadromous streams.</u> Early in the sale design, the significant surface waters were made part of the leave areas between the harvest units. Cutting the stream areas out of the harvest units early helps to streamline the process of identifying operable acres. At the time the Preliminary Decision (PD) FLUP was issued, the fieldwork was being finalized in the timber sale area. The fieldwork is now done. The DOF, as per AS 41.17.118(c), has presumed that all streams with connectivity to anadromous waters are anadromous or could contain resident fish. The DOF has buffered <u>all</u> these streams to at least the extent that the law requires (100 feet) and in some cases more, to achieve the <i>SFG</i> requirements for unit size and proximity.
Cascadia	Thank you for buffering all tributaries to salmon streams. I agree that the working assumption should be that all streams have riparian values, and should be protected. Please work under the assumption that the 100-300 ft. zone of management around streams <u>is</u> important to their riparian function, and should not be logged. There may be exceptions where it is appropriate to log within 300 feet of a stream, but as a standard practice, that would severely degrade the watershed.	<u>Dates for appeal.</u> The record for appeal becomes final on the date that the Final Finding is issued. See section IX. Final Finding and Decision, in the FLUP, for the actual date of issuance, as well as the deadlines for appeal (20 days after the Final Finding is issued).
	<b>Moose</b>	
RDC	RDC believes this sale will not only benefit the timber industry and the Mat-Su economy, but will also contribute to healthy forest regeneration and enhance wildlife habitat: <ul style="list-style-type: none"> <li>The sale area is generally over-browsed by moose, and the added acreage will distribute browse potential over a wider area and likely allow better stand development than what is presently exhibited.</li> </ul>	Comment noted.
Alaska Village	Most importantly, the sale would have a positive environmental benefit by renewing	Comment noted.



Commenter	Comment	Response
Initiatives	<p>essential moose habitat in an area (and in a state) that has had a steadily decreasing moose population.</p> <p>Through our Private Lands Wildlife Management program, we are actively supporting activities which positively impact wildlife habitat throughout rural Alaska. Habitat manipulation can be an expensive undertaking, and in areas such as this, the work can be accomplished as a by-product of positive economic activity instead of through a government subsidy. For these reasons we feel it is in the State's best interest to approve the proposed timber sale.</p>	
Alaska Moose Federation, Gary Olson	<p>The Alaska Moose Federation (AMF) would like to submit the following letter for your consideration during the public comment on the West Petersville #1 Timber Sale. The AMF, with over 700 members, hereby endorses the West Petersville #1 Timber Sale as a project that will greatly increase critical browse for moose. The goal of our organization is to increase the general health of Alaska's moose population. Sound, proven forestry practices can be used to greatly increase moose numbers in our state. The following points outline the reasons for our support.</p> <ul style="list-style-type: none"> <li>• This timber harvest activity will improve forest growth by replacing mature birch and spruce stands with new, vigorous growth of a new, healthy 'pioneer forest'.</li> <li>• This sale follows the <i>Susitna Forestry Guidelines</i> that are overly protective guidelines, ensuring protection for all critical resources that are important.</li> <li>• Disturbance of this forest is essential to maintain healthy moose browse. With the fire suppression requirements (because of the rural residential population) in the valley forest, timber sales become a very important means to maintain healthy environments for moose and other wildlife. In addition, this sale will provide the necessary disturbance with required scarification that will ensure new growth of willow, birch, aspen, cottonwood and spruce.</li> <li>• This sale falls within the 5 year timber harvest schedule for the Mat-Su Valley. Minimal timber harvest on state land in recent history has left moose habitat in poor condition in many areas. This sale is badly needed to maintain moose populations in the Mat-Su Valley.</li> </ul> <p>We have confidence in the professional foresters, biologists and managers with the state to properly design, layout and administer this timber sale. The AMF considers the West Petersville #1 Timber Sale as a Wildlife Enhancement and Rehabilitation Project. This project will be managed by professional forestry staff that will use the Alaska Forest Practice Act BMPs to ensure the timber is properly harvested.</p> <p>The result of this project will be healthier moose and the maintaining of the Alaska Lifestyle where Alaskans choose to live and work off the land. The vast majority of Alaskans support the Alaska Lifestyle as well as habitat enhancement programs that</p>	Comment noted.

Commenter	Comment	Response
	result in healthy Alaska wildlife species which we all love and treasure.	
Geoffrey Parker	I...suspect that the density of the sales units in this block will result in a decrease in moose density in the area, because so much of the area that will not be harvested in wetland. Regardless of whether browse increases, there may be a decrease in shelter for moose when so much of the non-wetland is harvested. Much of what will remain will be either wetland or cut-over land.	The total gross acres of the West Petersville #1 sale area is 5,883 acres. Of that, 1,819 acres are wetlands and another 43 acres have been harvested; leaving 4,021 acres or 68 percent as forested lands. 1,286 acres or 32% of the forested acreage is proposed for harvest. 2,735 forested acres or 68% will remain for recreation, wildlife, and other forest uses. According to ADFG:
Denis Ransy	As far as increased moose habitat, I am not under the impression that there is a “moose shortage” in the area. Trapper Creek locals routinely report numerous moose encounters on trails and roads, some of which ended in death or injury to the moose. It’s possible there is a moose surplus in which case you definitely do not want to create more habitat. What is the moose count in the sale area? This needs to be determined if moose populations are as important as your propaganda indicates.	<ol style="list-style-type: none"> <li>1. By mimicking some aspects of the fire regime of the past, the harvest will create more diversity, leaving an older, late successional forest with approximately 30-acre cuts dispersed throughout the area. The early successional wildlife species such as moose will benefit from the disturbance and subsequent browse, while buffers and leave areas will continue to support species adapted to the late successional forest types. Buffers will also act as travel corridors and provide cover for wildlife.</li> <li>2. The reduction of shelter for moose is not an issue, given the amount of buffer remaining. The only time moose seek shelter in the Susitna Valley during the winter months is in late winter/early spring when they sometimes seek shade during resting periods to keep from overheating due to their heavy winter fur. During the summer months, with leaves on the hardwoods, moose will have ample shelter from the warmer days. Even in unlogged areas, such shade generally does not coincide with foraging areas.</li> <li>3. Moose/people encounters along roads and trails is not an indicator of moose surplus. In reality, the moose population in the Petersville Road area has been in steady decline since the late 1980s.</li> <li>4. Moose/car collisions may decline as the timber sale creates browse and moose habitat away from roads and trails.</li> </ol>
	<b>Fish and game analysis</b>	
Geoffrey	This preliminary decision appears to reflect what I view as a “canned” evaluation.	The Tin Timber Sale and the West Petersville Road #1

Commenter	Comment	Response
Parker	<p>This document is remarkably similar to the “Tin Timber Sale.” For many sections, the two documents are identical. It appears that the DOF simply copied material that purports to be analysis, but falls short because it is simply copied text. Under similar federal statutes which require environmental impact analysis, such as decision documents prepared under NEPA, such canned analysis does not pass legal muster. This proposed sale may be an instance where it would be appropriate to ask a court to determine whether such canned analysis passes muster under the state statutes. I have not formed a final opinion about such matters, but if my clients were to succeed in requesting a court to hold that canned rationales for decisions do not comply with state law, then the effect would be felt widely across the state’s timber program.</p>	<p>Timber Sale have very similar issues in terms of fish and wildlife analysis. In both areas, the timber is mature, and the opportunities for moose browse will be increased from a timber sale. We abide by the same regulations for all timber sales in Region II, and in the Susitna Valley, the <i>Susitna Forestry Guidelines</i>, so the fish and wildlife guidelines for each sale will be similar. While the West Petersville #1 Timber Sale fish and wildlife information is similar to the Tin Timber Sale, it is accurate.</p>
	<b>Wildlife</b>	
Denis Ransy	<p>To say that wildlife will not be disturbed by a 1600 acre near-clear-cut is a joke. From the extremely load machinery and many workers present, to the barren, chopped-to-pieces end result, wildlife will be running like crazy. Some will eventually return, but the others will not be so lucky.</p>	<p>ADFG has provided DOF with information about the impacts of timber harvest on wildlife in the area:</p> <p>Birch trees are important as browse for mammals such as beaver, moose, snowshoe hares and porcupines. These herbivores are not only dependent on young hardwoods (early successional stage) for food, but the animals themselves are, in turn, major food sources for predators (Collins, 1996). In Southcentral Alaska, the most significant factor promoting the maintenance of early successional vegetation has been fire. Fire suppression for the last few decades has severely reduced this mode of hardwood production, and as a result, has changed the diversity and productivity of the boreal habitats and their wildlife (Collins, 1996). Reduction of overstory and ground covers by logging or land clearing can mimic the natural disturbances which stimulate hardwood growth (Collins, 1996).</p> <p>By mimicking some aspects of the fire regime of the past, the harvest will create more diversity, leaving an older, late successional forest with approximately 30-acre cuts dispersed throughout the area. The early successional wildlife species such as moose will benefit from the disturbance and subsequent browse, while buffers and leave areas will continue to support species adapted to the late successional forest types. Buffers will also act as travel corridors and provide cover for wildlife.</p>

Commenter	Comment	Response
Friends of Mat-Su	<p>This Forest Land Use Plan (FLUP) doesn't address the following:</p> <ul style="list-style-type: none"> <li>• Identification and protection of important wildlife habitat</li> </ul>	<p>Several changes have been made to add information to the Wildlife Habitat section of the FLUP, including scarification guidelines and a description of some of the stream buffers used.</p> <p>The timber sale was planned using the <i>Susitna Forestry Guidelines</i>. Because so much of the Susitna Valley was classified in the <i>Susitna Area Plan</i> for multiple uses (e.g., habitat, forestry, recreation, water resources), the <i>Susitna Forestry Guidelines</i> were developed to clearly define how timber harvest would be done to protect the other uses. The <i>SFG</i> recognizes the importance of non-timber values in the area, and protects them while providing access to timber resources.</p>
	<b>Timber roads</b>	
Mat-Su Borough, Murph O'Brien	<p>1. The Petersville Road Corridor Plan identifies the corridor from the George Parks Highway to Moose Creek, which includes the right-of-way and a 300-foot scenic buffer where it presently exists. From Moose Creek to Petersville, the scenic buffer includes the right-of-way and ¼ mile on each side. This plan references a Memorandum of Understanding (MOU) between the DNR and the Mat-Su Borough, which outlines restrictions to the land conveyed for the scenic buffer.</p> <p>If access is improved from Petersville Road (upgrading the old logging road), please acknowledge the MOU and consider the recommendations found in the Petersville Road Corridor Plan which include the following:</p> <ul style="list-style-type: none"> <li>• There should be landscaping and remediation of road cuts to stabilize slopes and minimize visual impact to scenic resources that are present.</li> <li>• Prior to undertaking disposals of public lands, a full review of the potential impacts to the community and the immediate environment should be completed.</li> <li>• Allow Community Councils to review and comment on proposed new parking lots and pullouts prior to development</li> <li>• Driveway permits are required from DOT/PF.</li> </ul> <p>...</p> <p>The sale area includes mapped Special Flood Hazard areas. Development such as roads, bridges, culverts, etc. in these areas will require a Mat-Su Borough Flood Hazard Development permit.</p>	<p>The Petersville Road Corridor Plan only applies to land within 300 feet of the Petersville Road itself. This timber sale (which is not a land disposal) does not propose to make any changes to land within 300 feet of the Petersville Road. An existing winter logging road off the Petersville Road will be used to start the access to the sale area and will not be upgraded to an all-season road. No new access points, parking lots, or pullouts off of the Petersville Road are proposed. The DOF's proposed route will use the existing road through and beyond the ¼ mile scenic buffer. By using the existing road, visual impact will be minimized. In addition, the existing road makes a slight bend after leaving the Petersville Road that screens the logging road from the Petersville Road.</p> <p>For the new timber road that will be constructed at the end of the old logging road, the Alaska Forest Resources and Practices Act and its regulations mandate specific standards for road construction and maintenance.</p>

Commenter	Comment	Response
Friends of Mat-Su	<p>The Mat-Su Borough (MSB) and the Dept. of Natural Resources have a Memorandum of Understanding (MOU) that outlines restrictions on land conveyed for a scenic buffer currently in place as a result of the Petersville Road Corridor Plan. If access is allowed please follow the MOU recommendations. These include:</p> <ul style="list-style-type: none"> <li>• Landscaping and remediation of road cuts to stabilize slopes and minimize visual impact to scenic resources that are present</li> <li>• Prior to undertaking disposals of public lands, a full review of potential impacts to the community and the immediate environment should be completed</li> <li>• Allow community councils to review and comment on proposed parking lots and pullouts prior to development</li> </ul>	<p>The DOF has contacted the Mat-Su Borough's Code Compliance Office and will complete the Acknowledgement of Existing Land Use Regulations Application as suggested by that office. Any Mat-Su permits (such as the Flood Hazard Development Permit) that are deemed necessary after completing the application will be acquired prior to the commencement of operations. The purchaser of the timber sale is contractually obligated to secure any permit required. Any permits required, such as Driveway, Fish Passage, and Flood Hazard Development, will be identified in the timber sale contract.</p>
Geoffrey Parker	<p>With respect to the road system, these timber roads are not in the current or the proposed Statewide Transportation Improvement Program. Federal law requires that all roads and trail projects be included even if they are not constructed with federal funds.</p>	<p>Neither the Department of Transportation and Public Facilities nor the Alaska Statutes require a temporary logging road to be in the Statewide Transportation Improvement Program.</p>
Sheryl Salasky	<p>Consider the impact of infrastructure (roads, machinery, resulting water, land &amp; air pollution potentials).</p>	<p>The Alaska Forest Resources and Practices Act was developed to prevent adverse impacts to streams and fish habitat. Timber road construction and maintenance must follow the standards set by the FRPA and its accompanying regulations. (See AS 41.17 and 11 AAC 95.285 to 95.320.)</p>
Jennifer Wilson-Witt, DOT/PF	<p>The Alaska Department of Transportation and Public Facilities seeks additional information regarding the proposed West Petersville #1 Timber Sale. We own and maintain the Petersville Road that the logging trucks will be using. Conflicts with other users of the area need to be taken into consideration and impacts to the road need to be mitigated. Please work directly with these individuals to coordinate permits that will be necessary:</p> <ul style="list-style-type: none"> <li>• Lynda Hummel will accept approach road applications for the Petersville Road, at 269-0698.</li> <li>• Kurt Devon is a good first contact regarding maintenance of the Petersville Road, at 745-2159.</li> </ul>	<p>DOF has contacted DOT/PF about this timber sale. The purchaser of the timber sale is contractually obligated to secure any permit required.</p>
Cascadia	<p>Roads in particular could significantly degrade water quality, and will certainly degrade wetlands. While BMP's and common-sense can prevent a lot of the pollution, conditions will worsen as years go by because this remote, dead-end road is likely to get passed over for maintenance. Where will the maintenance budget for this road come from?</p> <p>The FLUP is unclear whether logging will be restricted to winter-only logging and</p>	<p>The timber road will be put to bed at the end of the timber sale, following the Forest Resources and Practices Act and its regulations. It will not be a permanent road, so long-term maintenance will not be required. Specific maintenance requirements for the road during timber harvest operations will be</p>

Commenter	Comment	Response
	ice roads. Under transportation you mention "winter road," but sale design seems to include summer work, for example, scarifying units. Please clarify. If at all possible, please restrict use to winter logging, in order to avoid damage to soil and watersheds.	<p>incorporated into the sale contract.</p> <p>Change made. Added to FLUP: Specific maintenance requirements for the road during timber harvest operations will be incorporated into the sale contract.</p> <p>Timber harvest will only occur during the winter. Scarification, though, may be done during the winter or in non-winter months. Scarification, which will be done to ensure proper reforestation, may not be effective if attempted during the winter months, and may need to be done during the summer. Entry to this area in non-winter months will be limited to scarification machinery and will be coordinated with OHMP.</p>
	<b>Traffic</b>	
Mat-Su Borough	Recent timber sales have resulted in conflicts between local traffic, school busses, and timber operators. Timber operators should avoid moving trucks and equipment along Petersville Road during school bus pick up and drop off times and hours of peak local traffic volumes.	<p>Change made. Added to FLUP, Harvest methods: <b>Hours of operation.</b> The DOF will limit hours of trucking to avoid local recreational traffic on weekends, and to avoid times when school buses are on the roads. The timber sale contract will specify the hours of operation.</p> <p>In addition, the DOF will abide by any hours of operation ordinance that the Mat-Su Borough adopts.</p>
Trapper Creek Community Council Board of Directors	Safety: access to the harvest area is via ten miles of a narrow, winding road, which has no shoulders. Use of this road by heavy trucks and equipment under winter conditions will be hazardous, especially during weekends when hundreds of vehicles hauling snowmachine trailers crowd the road.	
Kenneth Marsh	Not for us who have to use Petersville Road and have our kids on it with these big chip trucks going down it. Send them down your road.	
Krister Bowman	Logging trucks through residential areas of the Petersville Road (with a school) are a serious danger.	
Sandra White	Logging trucks through residential areas of the Petersville Road (with a school) are a serious danger.	
Mat-Su Borough	Increased heavy truck traffic from recent timber sales in the Upper Susitna Valley has also had an impact on local road conditions. A maintenance agreement or bond should be provided for Oilwell Road and portions of Petersville Road to ensure any necessary road repairs and damage resulting from the timber sale activity can be remedied.	A maintenance bond will be addressed in the timber sale contract. We are not using Oilwell Road for the timber sale. The Petersville Road is maintained by DOT/PF, and DOF will work with DOT/PF to mitigate impacts to the road. Hours of operation will be limited to minimize conflicts with weekend recreational users and school buses, and will be determined in the timber sale

Commenter	Comment	Response
		<p>contract.</p> <p>Change made. See response to comments above for new section added to FLUP about hours of operation.</p> <p>The purchaser of the timber sale is contractually obligated to secure any use or maintenance agreement required for the use of roads owned by private, federal, state and local landowners or administrators.</p> <p>See also response to Mat-Su Borough, above.</p>
Ruth Wood	<p>The FLUP makes no mention of the fact that the Petersville Road is a residential road. Will the hours of operation be adjusted so that chip trucks and school busses are not on the road at the same time? Will the contractor be responsible for damage to the road? The contractor, not the state, should be required to build and pay for the 12 miles of new road.</p>	<p>The Petersville Road is a state-maintained highway, administered by the DOT/PF. DOF will work with DOT/PF to mitigate damage to the Petersville Road.</p> <p>The new 12 miles of road for the timber sale will be constructed by the timber sale contractor. The cost of that road is part of the timber sale. As part of the timber sale contract, the purchaser will be responsible for maintaining the timber road.</p>
	<b>Noise</b>	
Mat-Su Borough	To reduce noise impacts generated from trucks and equipment moving along the Petersville Road corridor, timber operators should attempt to limit operations (on Petersville Road) to pre-established hours, so that local property owners can expect a reasonable “quiet time.”	<p>Hours of trucking will be incorporated into the timber sale contract to reduce noise. We will abide by any noise ordinance that the Mat-Su Borough adopts.</p> <p>Change made. Added to FLUP, Harvest methods:</p>
Denis Ransy	Noise could also be a major problem for nearby residents—I operated a chipper at a Louisiana-Pacific sawmill and the noise was ear-shattering, and sometimes carried for miles.	<p><b>Hours of operation.</b> The DOF will limit hours of trucking to avoid local recreational traffic on weekends, and to avoid times when school buses are on the roads. The timber sale contract will specify the hours of operation.</p>

	Road closure and ATV use	
Ruth Wood	The 12 miles of new road should be obliterated and returned to a natural state, not simply closed, after the operation is finished.	<p>Change made. Explanation of road closure guidelines has been added to the Transportation section. The phrase that made road closure to ATVs contingent upon economic and ground conditions has been deleted. Blockages to ATVs will be added to the contract.</p> <p>The area proposed for timber harvest is already used heavily by ATVs, as evidenced by the many trails crisscrossing the muskegs. The people using the area for ATVs generally park in the Kroto Creek parking lot and access the area through the wetlands, even in non-winter months. Using ATVs on state land does not require a permit; it is a generally allowed use, as long as the vehicles do not break through the vegetated mat.</p> <p>Currently, ATVs access the sale area off of the Petersville Road approximately 1.5 miles west of the DOF's proposed route. The ATV trails cross both uplands and wetlands, with most of the ATV activity occurring in the fall during the hunting season. DOF's proposed route to the timber sale uses an old winter logging road for the first half mile, which presently shows little to no use by ATVs. The road's use is probably limited by a stream crossing the road at about a half mile from the Petersville Road that would be difficult for ATVs to cross during non-winter months.</p> <p>Winter roads and ice bridges will be used to access the sale. The stream will not have a year-round crossing, so the stream will continue to limit ATV access. As stated in the Transportation section of the Forest Land Use Plan, after timber harvest and reforestation activities are completed, all roads constructed for this sale will be closed. The closure will meet the standards in 11 AAC 95.320, which requires the road be blocked so four-wheeled highway vehicles cannot pass. Since the road will be blocked to highway vehicles and the stream limits ATV access, access will be the same as it was</p>
Geoffrey Parker	<p>Even though the preliminary decision refers to a 12-mile, supposedly winter road system that may in theory be closed after a sale, it is virtually impossible to prevent ATV use of the corridor created by such a road system. The result will be in increased access off of Petersville Road, particularly by ATVs, into the sale area.</p> <p>The preliminary decision, at page 6, acknowledges that hunting pressure may increase due to increased access. As recently as last week, the Anchorage Daily News wrote of problems associated with increased ATV access in the Susitna Valley. Mr. Gillam uses ATVs and is not per se opposed to their use. Instead, ATVs are appropriate in some areas and not in others. In this instance, portions of Game Management Unit 16 have already had subsistence preferences triggered, and increased access and demand, particularly for moose, will likely trigger more such preferences.</p> <p>...</p> <p>Next, I do not understand what the PD means when it says that "post harvest activity by off-road vehicles on the newly constructed winter roads will be restricted as economic and ground conditions allow during road closure at the end of the seasonal operations." This appears to say that after the seasonal operations have ceased, access by off-road vehicles will be allowed but restricted as "economic and ground conditions" permit. This appears to say that if the harvester cannot afford to enforce a road closure or restriction, no one will. Because DNR routinely does not address ATV issues on state lands in the Susitna Valley, hunting and fishing is impacted directly and indirectly, and it is impossible to sustain the finding of this preliminary decision that such impacts will not occur. They have occurred elsewhere in the Valley.</p>	
Denis Ransy	Trail users of all types will definitely use any vestige of trail left after the cut. Is this what the community wants? We are looking at many miles of new and probably permanent trails in the area.	
Brian and Diane Okonek	Under Recreation on page 8 it states "Post harvest activity by off-road vehicles on the newly constructed winter roads will be restricted as economic and ground conditions allow during road closures at the end of seasonal operations." It's hard to tell what this means. All roads should be closed to ATV use. In reality they will all be used by ATV's after logging operations cease because there will be no enforcement to keep them out. There has been considerable destruction done to wetlands by ATV use all along the Petersville Road and this logging operation will increase this problem.	



Friends of Mat-Su	<p>This Forest Land Use Plan (FLUP) doesn't address the following:</p> <ul style="list-style-type: none"> <li>Roads created as a result of logging open access to wetlands once the harvest is complete.</li> </ul>	<p>prior to harvest.</p> <p>11 AAC 95.320 states:</p> <ul style="list-style-type: none"> <li>Roads and ditches will be left in a condition that will control erosion.</li> <li>In areas accessible to highway vehicles, the road is blocked so that a four-wheeled highway vehicle cannot pass the point of blockage.</li> <li>Bridges, culverts, and fills are removed from surface waters.</li> </ul> <p>In addition to closing the road to highway vehicles, the DOF will specify in the contract that the entrance to the timber road from the Petersville Road will be blocked off with dirt mounds and tank traps, to discourage ATV use of the road. However, the use of ATVs in the area will likely not decrease from the present use, because even now ATVs are using the muskegs and wetlands to access the area, and are not dependent on the road.</p> <p>The area is used extensively by snowmachines. Access for snowmachine enthusiasts is provided by the nearby Kroto Creek Parking lot. Although the timber sale will not provide additional parking, it may increase the use the area gets from snowmobiles.</p>
Sandra White	Summer 4-wheeler traffic will never allow logging roads to revert to forest, and provide even greater access to areas that will remain permanently trafficked.	
Sandra Kogl	Another big concern associated with logging operations is the construction of logging roads which then are used for more and more ATVs to find easy access and further degrade the landscape, especially when wetlands are involved. Constructed roads should be de-constructed whenever possible. ATV restrictions need to be in place and ENFORCED!	
Krister Bowman	Summer 4-wheeler traffic will never allow logging roads to revert to forest, and provide even greater access to areas that will remain permanently trafficked.	
Cascadia	This area is very heavily used by ATVs in all seasons, so if you build roads here they are going to be used. We strongly dispute that "closure" under the Forest Practices Act will effectively mitigate use by ATVs. Use by hunters and ATVs will contribute to continuing impacts. One idiot on an ATV could do substantial damage on these creeks and wetlands. Trappers and hunters would probably do quite well for themselves. The impact to fish and wildlife populations could cumulatively be very significant.	
Rick Ernst	3 <sup>rd</sup> Because of ... the logging roads that open up more and more areas to use and misuse of ATVs and larger vehicles the short term gain is not worth the destruction of a long term vigorous and sustainable tourism economy.	
John Strassenburgh	<p>Second, some of your sentences are impossible to interpret. For example, on page 8, you state: "Post harvest activity by off-road vehicles on the newly constructed winter roads will be restricted as economic and ground conditions allow during road closure at the end of seasonal operations." This sentence can be interpreted in different ways, so your intent is pure guesswork. Meaningful public response to statements such as this is not possible.</p> <p>...</p> <p>Sixth, when logging operations are complete, all roads should be obliterated. Mere "closure" is of little benefit, and will result in ATV traffic. This means more access, and consequent damage to wetlands, and it means sedimentation in streams. The FLUP should mandate obliteration of all roads.</p>	
Becky Long	Based on studying the maps, it seems that there is at least 17 miles of mainline winter roads to be built, more than the stated 12 miles. This will create access with impacts	There are 11.9 miles of mainline road planned to access the timber sale area.

	into the area, which will increase ORV/snowmachine recreational use and increase hunting pressure.	For a response to the comment about increased ATV use, please see the response to the other comments in this section, above.
	<b>Wetlands</b>	
Geoffrey Parker	With respect to NEPA, I am concerned that this sale may result in fill being deposited in wetlands, either by the process of winter road construction or by deposit of slash. If so, that would require a section 404 permit under the Clean Water Act, as well as permits from the DNR habitat office. That issue is not addressed in the preliminary decision.	<p>Silvicultural activity (timber harvest, thinning, etc.) is an approved activity in wetland areas under federal law (33 CFR 323.4), and is exempted from requiring a Section 404 permit. The DOF will operate this timber sale under the provisions of this exemption and will incorporate the best management practices in its operations as listed in federal law.</p> <p>The DOF minimizes its actions in non-forested and forested wetlands to the extent necessary to economically access timber while maintaining water and soil quality. The DOF uses the area plan, the Alaska Forest Resources and Practices Act (FRPA), and their professional judgment to provide adequate protection and mitigation for wetland resources in the proximity of silvicultural activities. Through the FRPA, the DOF is required to minimize and mitigate all activities in and around surface waters that may affect water and soil quality. The DOF's proposed actions are further reviewed by the Department of Environmental Conservation and the Office of Habitat Management and Permitting as they receive copies of the FLUP.</p> <p>The DOF protects all surface water through management prescriptions and maps surface waters and wetlands when appropriate to communicate needed action or protection. The FRPA is the product of the best available data, is maintained by scientific peer review, and is specifically designed to conserve water and soil resources during silvicultural operations.</p>
	<b>Tourism</b>	
RDC	This timber sale is expected to result in no adverse changes to recreational or tourism use of the area. Visual impact from the sale will be nonexistent from the Petersville Road after operations are completed in the sale area.	Comment noted.
Mat-Su Borough	The Draft South Denali Implementation Plan and Environmental Impact Statement (EIS) identifies several areas along Petersville Road in the general vicinity of the proposed timber sale, as potential locations for scenic viewpoints and parking turnouts	The DOF's proposed road is 2.4 road miles from the nearest turnout/viewpoint and 8.2 road miles from the Forks Campground as described in the Draft South

	to accommodate increased recreational activities. Locating road access points to Petersville Road away from these areas is requested. See the copy of enclosed Figure 2-1 from the draft plan.	Denali Implementation Plan and Environmental Impact Statement. The proposed road is also 27 road miles from the Mile 121.5 Trailhead Parking Area and 21 road miles from the Rabideux Trailhead Parking Area. The proposed pedestrian/bike path will be located on the north side of the Petersville Road. DOF's proposed access road will connect to an old logging road on the south side of the Petersville Road and will only be used for harvest activities in the winter.
Ruth Wood	The FLUP does not address the impact on scenic resources via airplane. The economy of the area is tourism, and many of those tourists take scenic flights. What will be the impact on the flight-seeing economy?	See "General response to comments," page 2 of this document, for the explanation of Forestry classified land.  Change made. Added a new section to the FLUP: E.Planning Framework.  The FLUP notes that the timber harvests were laid out with uneven edges to benefit wildlife, as recommended in the <i>SFG</i> (p. 19), which will make the harvest areas look more natural from the air.
Mr. & Mrs. James Denison	We are not Alaskan residents, but we have visited Alaska five times for the same reason millions of other tourists visit Alaska—for its wilderness quality and its wildlife! Over 94% of Americans don't hunt (we travel thousands of miles at great expense to see true wilderness and the wildlife ALIVE in their natural habitat!) We don't go to all this trouble and expense to see tree stumps and no wildlife! We were very concerned on our last few visits to see more clearcut forests, and nary a wolf or bear! This plan states that this logging serves "the best interest of the state." We strongly disagree with you; we believe that clearcutting old growth forests serves the interests of the timber corporations and provides more browse area (moose targets for hunters), but in the long term, it will not be in the best interest of Alaskans or tourism, a very important source of revenue. Logging may provide a few temporary jobs, but Alaskans will be short-changed in the long run. Studies show that an intact forest has not only much more environmental value, but economic value as well—as in tourism revenue. The wildlife we travel to see are either being killed (as are wolves) and/or their habitat is disappearing! And providing "visual buffers" doesn't fool anyone! Millions of other concerned Americans agree with us!	The total gross acres of the West Petersville #1 sale area is 5,883 acres. Of that, 1,819 acres are wetlands and another 43 acres have been harvested; leaving 4,021 acres or 68 percent as forested lands. 1,286 acres or 32% of the forested acreage is proposed for harvest. 2,735 forested acres or 68% will remain for recreation, wildlife, and other forest uses.  For an explanation of the impacts of timber harvest on moose and other wildlife species, please see the responses to comments in the sections above on "Moose" and "Wildlife."  The timber sale will not be visible from the Petersville Road because the closest harvest unit to the road will be a half-mile away from the Petersville Road.
Brian and Diane Okonek	There are many remote cabins in the area and the owners were drawn to the area because of the beauty, there is a thriving tourism industry in the region depending on the natural scenic value and pristine conditions of the fishing streams. Flightseeing businesses are critical to the local economy and a natural landscape from the air is very important to visitor satisfaction. The package tour industry is based on the natural beauty and wildlife as a main selling point. State and National Parks are investing	The majority of state land in the Petersville Road area will remain unharvested, partly because of varying land use classifications on different areas of state land, and partly because harvest is limited by our annual allowable cut.  See "General response to comments," page 2 of this

	heavily in the region because of the unique scenery. Logging is in direct competition with the growing tourism based economy that the Borough benefits greatly from. It must be carefully weighed as to how logging will impact tourism.	document, for the explanation of forestry classified land.  Change made. Added a new section to the FLUP: E.Planning Framework.
Arthur Mannix	This is of particular concern in light of the upcoming construction, after literally decades of planning, of a new Denali National Park Destination Visitor Center in the near vicinity. The center is expected to draw in excess of 250,000 visitors per year. many of them flightseerers, to the South Denali landscape. For years I was a member of the State Parks Citizens Advisory Board. Of frustrating noteworthiness, on the ground, there has been very little cross-agency cooperation over the years. and we have such a patchwork of land ownership here.	Five Year Schedules of Timber Sales and Forest Land Use Plans are distributed to different state and local agencies to gather comments.  The proposed timber sale will be 19 air miles (24.6 road miles) from the Nature Center proposed in Alternative B and 22 air miles (33.6 road miles) from the Visitors' Center proposed in the preferred Alternative C. The timber sale should not impact the visitor center or other road-based tourism, because it will not be visible from the road. The harvest unit that is closest to the Petersville Road is a half-mile away. Impacts to flight-seeing will be mitigated by irregular edges of harvest units.
Sandra White	Please stop the sale of Trapper Creek land (West Petersville #1 Timber Sale)for 60\$ per logged acre, which is basically giving it away. This proposal cannot happen. Our economy is tourism, which will be seriously impacted. ... Virtual clearcuts such as at mile 108 Parks Hiway denigrate a local economy based on tourism. Visitors come to the South Denali region because it is intact and wild. Industrial logging destroys that economy. ... The future of the upper Valley is in preserving the economic mainstay (tourism, especially independent tourism) and not in bulldozed new roads criss-crossing the landscape.	
Sandra Kogl	Of major concern is that the FLUP does not adequately protect non timber uses in this area which has been designated for multiple use activities. A case in point is the visual impact of logging activities in areas situated in scenic flight corridors. Tourism is BIG BUSINESS in the Susitna valley and efforts need to be made to retain as much pristine country in the viewshed as possible. Of equal importance, in my opinion, is the protection of natural scenic beauty and wildlife habitat for the benefit of the many Alaskan residents who live and recreate in the area. The quality of life for many of us is intimately tied to having large tracts of undisturbed land in our viewshed... that is what Alaska means to me. Logging areas with irregular, mosaic borders or islands of intact vegetation go a long ways toward mitigating visual impacts	Both non-timber and timber uses are provided for by the plans that govern land use in the Susitna Valley. See "General response to comments," page 2 of this document, for an explanation of the broad-scale planning efforts that determined the mix of uses that are allowed in the Susitna Valley.  Change made. Added a new section to the FLUP: E.Planning Framework.  Non-timber uses have been provided for in the <i>SFG</i> and the FLUP. The sale area is made up of 35 units. The

Rick Ernst	<p>2<sup>nd</sup> Tourism is our primary private economy here. 70%+ of the Mat-Su Borough Bed taxes come from the Upper Susitna area (i.e. Trapper Creek and Talkeetna ). The largest amount from the CIRI and Princess Hotels and other B and Bs in the region. Guided fishing and hunting trips, hiking, birding, float trips down our waterways, winter sports as snowmachining, skiing, mushing and flightseeing also continue to help provide a sustainable economy. All of the above are dependent on having forests and streams that are in their “natural state” not cut over in large portions. Tourism thrives here because visitors come to Alaska to see the forests, rivers and landscape as they have been for millennia.</p> <p>3<sup>rd</sup> Because of the long regeneration times for logged forests in the region ... the short term gain is not worth the destruction of a long term vigorous and sustainable tourism economy.</p>	<p>average size of the units is 37 acres, and the size ranges from 11 to 58 acres. In the few units that are larger than 50 acres, islands of timber will be included in the final layout of the unit so that the harvested area is less than 50 acres. As mandated by the <i>Susitna Forestry Guidelines</i>, each cutting unit is surrounded by unharvested strips at least 330 feet wide.</p> <p>See also the response to Mr. and Mrs. James Denison’s comments, above, in this section, as well as other responses to comments in this section.</p> <p>The FLUP notes that the timber harvests were laid out with uneven edges to benefit wildlife, as recommended in the <i>SFG</i> (p. 19).</p>
Krister Bowman	<p>2) Virtual clearcuts such as at mile 108 Parks Hiway denigrate a local economy based on tourism. Visitors come to the South Denali region because it is intact and wild. Industrial logging destroys that economy.</p> <p>...</p> <p>The future of the upper Valley is in preserving the economic mainstay (tourism, especially independent tourism) and not in roads criss-crossing the landscape.</p>	<p>Change made. Added to the FLUP: The sale will be visible from the air. However, timber harvests were laid out with uneven edges to benefit wildlife, which will make the harvest areas look more natural from the air.</p> <p>See also the responses to comments in the “Rotation age” and “Reforestation” sections, below.</p>
	<b>Recreation</b>	
Trapper Creek Community Council Board of Directors	The area to be harvested is used extensively by winter recreationalists, who do provide significant economic support to local businesses. Loss of the sale area for snowmachining, skiing, and dog sled tours during harvest operations will hurt tour operators and lodging providers.	During the period of active operation, which will be only during the winter months, the harvest units would not be conducive to recreation. However, recreation could continue in areas around the timber sale. In general, dog mushers, skiers and snowmachiners travel on the frozen wetlands, and these areas will not be affected by timber sales. The harvest operations will occur over a relatively short window of time, and after the harvest, recreation opportunities will still be available throughout the area.
	<b>Cultural sites</b>	
Mat-Su Borough	If construction reveals archaeological/cultural resources, then in addition to contacting the SHPO office, contact Fran Seager-Boss, Mat-Su Borough Cultural Resources Specialist.	Change made. Added to Final Finding that DOF will also contact the Mat-Su Borough’s Cultural Resources Specialist if any archaeological/cultural resources are found.
	<b>SuForest Guidelines</b>	
Mat-Su	The Mat-Su Borough does recommend again, the State review the Susitna Forest	We are currently gathering background information to

Borough	Guidelines ( <i>SFG</i> ) and provide an opportunity to update the guidelines. Rules for timber management regarding the size of harvest unit, buffer between units, and areas that can be logged should be reviewed. Current mechanization technology, wildlife habitat, market demand, socio-economic opportunities, and forest health are all issues that possibly would change in the <i>SFG</i> with a fresh review of the Susitna Valley Forests.	begin the process of updating the Susitna Forest Guidelines.
Becky Long	I don't believe that there is adequate staff to implement <i>SFG</i> in this timber sale. <i>SFG</i> , dated 1991, states that their staff is inadequate (back then) to implement <i>SFG</i> , and with all the cutting of state budgets, I can't imagine the situation has changed.	<p>The Funding and Enforcement section of Chapter 3 (Implementation) of the <i>SFG</i> explains that in 1991, when the plan was drafted, 1991 staff levels in the Mat-Su were inadequate for implementing the <i>SFG</i>.</p> <p>Since 1991, we have brought staff from other areas to help with field research, timber sale and road design, monitoring, and enforcement, and have implemented the Alaska Forest Resources and Practices Act (FRPA) and <i>SFG</i> as required. In addition, the funding that the DOF has received to implement FRPA has increased.</p>
<b>Public process</b>		
Mat-Su Borough	Extensive public involvement and education is critical to the success of this timber sale. Please provide the Borough a summary of the public education/involvement process associated with this timber sale. This area is well-known for recreational opportunities and active community participation. Community Councils within the area should be alerted to the plan.	<p>See "General response to comments," page 2 of this document, especially the Public notice section, for a description of the public process associated with this sale.</p> <p>Change made: Public Notice section added to the Final Finding.</p>
Friends of Mat-Su	We recommend that the FLUP consider these impacts, revise the proposal and expand the public process to include a public meeting to explain the complexities of the FLUP to the public. This meeting could include and accept public comment as well as a written comment period. Division of Forestry would then incorporate public concerns into the FLUP. These are public lands and public forests and the Division of Forestry needs to protect the public's interests in regards to current and future timber sale proposals.	<p>The public process was consistent with the guidelines in the <i>SFG</i>, to hold the public meetings to review and gather comments on the Five-Year Schedule of Timber Sales. The DOF held two public meetings in March and April to gather comments on the Five-Year Schedule of Timber Sales. The meetings were held at the Trapper Creek School and at the Willow Community Center.</p>
Kenneth Marsh	I know the state forestry department is used to just doing as it wishes without really listening to the local public but this must stop. We count more than your need for a job and the chip companies need to make money with our local trees.	<p>The written public comments we receive on the FLUP have been incorporated into the Final Finding.</p>
Rick Ernst	I am a concerned resident of the Trapper Creek Community Council Area in which this sale is occurring. I believe this sale should have more public input and discussion before any decisions are made as to the amount and time schedule for proposed timber sales if any at the present time.	<p>The mailing list for the Five Year Schedule of Timber Sales and the FLUP included all the community councils in the area. There is no private property within</p>

Richard Leo	Serious flaws exist in the proposal and the stated means of harvest. Ramming the harvest past public procedure and public opinion is unethical, unwarranted, and, ultimately, illegal. Alaska does not need more timber fiascos.	a quarter-mile of the sale.
John Strassenburgh	<p>If Division of Forestry is truly interested in learning and being responsive to the public's concerns, it would hold a public meeting (probably at the Senior Center or Susitna Valley High) to explain this FLUP and accept comment.</p> <p>...</p> <p>This FLUP is not a credible document and I believe that the Division of Forestry does the public a disservice by its failure to design a reasonable timber sale. These are public forests, and the public depends on the Division of Forestry to protect its interests. Unfortunately, this FLUP fails, utterly, in this regard.</p> <p>I urge you to defer this sale until you have held a public meeting as suggested above, have accepted public comment, and until you have considered and incorporated the public's concerns into your Plan.</p>	
John Strassenburgh	First, regarding the West Petersville #1 FLUP, and after the comment period closes (which is today, I believe), please send me copies of all of the public comments you have received, including agency comments. I am especially interested in seeing copies of ADF&G and OHMP (formerly Habitat Division, now in ADNR) input to Div of Forestry regarding this proposed sale.	All the commenters will receive a copy of this Response to Comments document and the Final Finding.
Cascadia	In the future, when notifying the general public, please disclose the acreage proposed for treatment, rather than by volume expressed in "cunits." What <u>is</u> a cunit, anyway?	The preliminary FLUP estimated that the DOF would offer 1,641 acres for sale. (The number of acres has changed in the Final Finding to 1,286 acres.) A cunit is a measure of solid wood log scale. A cunit equals 100 cubic feet of solid wood. Cunits were used to estimate the usable volume of the trees on this site due to the tree species type and the market suitability of the stand as whole.
<b>Trapper Creek Comprehensive Plan</b>		
Denis Ransy	Do not offer this timber for sale. Trapper Creek is currently working on its Comprehensive Plan. Any timber sale in the area should be cancelled at least until the plan is completed. Trapper Creek Community Council has come out against them twice in 2005. This shows definite local resistance to the sale.	When the Trapper Creek community adopts its Comprehensive Plan, we will include the plan in our considerations for offering timber sales in the area. It is not certain at this time that a plan will be adopted.
Becky Long	I support the October resolution of the Trapper Creek Community Council to postpone this timber sale until after the Trapper Creek Comprehensive Plan process is complete. This timber sale could be out of compliance with the future comprehensive plan.	

Trapper Creek Community Council Board of Directors, Burnu Watkins	<p>On February 23<sup>rd</sup>, 2005, the Trapper Creek Community Council Board of Directors requested that the West Petersville #1 timber sale be withdrawn from the FYSTS. Our request was not approved.</p> <p>We have now received the Fall 2005 FLUP PD for the same area, which includes another invitation to comment on the plan.</p> <p>Once again, the Board of Directors of the Trapper Creek Community Council has voted to request withdrawal of this sale for the same reasons given in our February letter. As stated in that letter, the Community Council, with the support of the National Park Service and the Mat-Su Borough, is in the process of developing a comprehensive plan for our area. The plan has still not progressed to the point of determining how the community wants to deal with timber harvesting in the area.</p> <p>...</p> <p>The Board is not opposed to timber harvesting in general, but until all members of the community have had the opportunity to make their desires known by acceptance of a comprehensive plan, we feel it is our obligation to make this request. We hope you will give it your serious consideration.</p>	
Friends of Mat-Su	We acknowledge and support planning efforts and community plans throughout the borough. Currently the Trapper Creek and Y area residents are working on comprehensive plans and they should be afforded the opportunity to weigh in on the proposal in relation to their plans.	
Sandra White	The Trapper Creek Comprehensive Plan is in its final stages of completion. Because it addresses timber harvests within the Trapper Creek area, all current and future timber sales must be halted until it is completed.	
Richard Leo	Under no circumstances should this timber harvest be allowed to proceed as is. The Trapper Creek Comprehensive Plan, nearing its completion, would significantly alter the operations and procedures of the proposed harvest. Trapper Creek's and the Upper Su Valley's burgeoning tourism economy would be seriously impacted. Logging roads would denigrate fish and wildlife habitat.	
Rick Ernst	1 <sup>st</sup> The Trapper Creek Community is in the process of developing a Community Comprehensive Plan. The Plan should logically be in place BEFORE these sales are authorized or not. This sale of 4,000 + acres of forest land up for possible harvest needs much more scrutiny as per Murph O'Brien's Mat-Su Borough's comments from page one, "Prior to undertaking disposals of public lands (in this case State lands) a full review of the potential impacts to the community and the immediate environment should be completed." I do not believe this has been done.	



Krister Bowman	1) The Trapper Creek Comprehensive Plan is in its final stages of completion. Because it addresses timber harvests within the Trapper Creek area, all current and future timber sales must be halted until it is completed.	
	<b>Susitna Area Plan</b>	
Denis Ransy	As far as plans go, the Susitna Area Plan and the <i>SFG</i> are 20 years and 14 years out of date, respectively. These need to be revisited before logging proceeds.	When the <i>Susitna Area Plan</i> and the <i>Susitna Forestry Guidelines</i> are updated, we will follow the new guidelines.
Becky Long	Forestry issues are some of the most controversial land use issues in the Susitna Valley. This timber sale is based on the forestry co-primary use in the Susitna Area Plan. SAP, signed in 1985, is outdated. Changing social and economic conditions place different demands now on state lands than in 1985. The Comprehensive Plan will make recommendations to revise or retain the land use designations of these management units. You should wait until this process is done.	The <i>Susitna Forestry Guidelines</i> were adopted in 1991, and were intended to guide forest management for the next ten years (through 2001, see Page 1 in the <i>SFG</i> ). The DOF is gathering data to begin to update the <i>SFG</i> , but in the meantime, we will continue to abide by the existing guidelines.  See also response to comments above in the “Trapper Creek Comprehensive Plan” section.
	<b>Borough permit</b>	
Friends of Mat-Su	The MSB has been conducting timber sales recently and they have been controversial for a number of reasons. The borough is in the process of comprehensively addressing the impacts with public input. We will continue to monitor and participate in this process. Impacts from MSB timber sales included: <ul style="list-style-type: none"> <li>• Conflicts between timber operators, local traffic and school buses</li> <li>• Impacts on local road conditions</li> <li>• Noise impacts to residents as a result of no limit to hours of operation</li> <li>• Inadequate data on how these sales will impact local small businesses that rely on sustainable forest products such as milling wood from selective cutting of trees or birch syrup production</li> <li>• Impacts to recreation or tourism</li> </ul>	The Mat-Su Borough has not yet adopted a new timber harvest policy. In the meantime, before the Mat-Su Borough establishes guidelines to address these issues, the DOF will address these issues in the timber sale contract. For details about how these issues will be addressed, see specific responses to these issues in other sections of this document: <ul style="list-style-type: none"> <li>• Traffic</li> <li>• Timber roads</li> <li>• Noise</li> <li>• Small sales</li> <li>• Tourism</li> </ul>
Dave Johnston	The Borough's permitting process for timber harvest has not yet been completed. Please postpone awarding any further contracts or permits until the Borough has gone through the public process on a forest use and management plan and a permitting process has been finalized. There have been many problems with NPI's chipping operations in the Upper Susitna Valley, and these things need to be considered before any new agreements are made with NPI or other chipping or timber harvest contractors. Thanks for your consideration,	

	Economics	
RDC	<p>In addition, the sale falls within the five-year timber harvest schedule for the Mat-Su Valley. The sale will benefit Alaska's economy by providing royalties to the State of Alaska in the form of stumpage receipts. The economy will also benefit from additional wages, purchases, and jobs.</p> <p>...</p> <p>A final and positive decision to move forward with the sale would meet the objectives of the Five-Year Schedule of Timber Sales and DNR's constitutional mandate. It also meets the silvicultural objective of improving forest vigor, provides for a value-added end products and creates additional jobs in Alaska. Moreover, the sale successfully meets one of the main objectives of the Division of Forestry—to make state-owned timber consistently available to the timber industry.</p> <p>Meanwhile, a negative decision would result in no utilization of the forest. There would be no significant contribution to the State and local economies. A negative decision would delay the management objectives planned for the area, would deny making a source of raw materials available to the local wood products industry, and would delay the harvest of dead trees, mature trees, disease-infected trees, and trees at risk to insect infestation.</p>	Comment noted.
Ruth Wood	<p>This kind of logging costs the state money. It does not help the state's economy. It will not help the local economy as evidenced by the fact that other sales haven't. Workers come from other areas and don't stop to buy anything.</p> <p>...</p> <p>The FLUP makes statements but doesn't supply evidence that logging supports services through sales of fuel, food, housing, medical and miscellaneous supplies. It just doesn't happen.</p> <p>It is incorrect that taxes are paid to cities and the Borough by operators and employees. What taxes? The only taxes in the northern Borough are property taxes, and these transient workers won't be paying those.</p> <p>The FLUP says new jobs will be created. What jobs? How many jobs? The FLUP says 11,690 man hours. Assuming a 40 hour work week, over a two year period, that translates to 2.75 jobs. Whoop de do, won't that make a difference to the local economy—I don't think it will be noticeable.</p> <p>...</p> <p>The statement that all timber sales were sold provides evidence that supply has not exceeded demand is obviously written by someone who never studied economics. When supply exceeds demand, price falls to the point where the amount supplied</p>	<p>Changes made, see below.</p> <p><u>Duration of operation.</u> The numbers used in the Preliminary Decision FLUP to estimate the labor involved in the harvesting of this timber have been amended to better reflect the conditions and circumstances of the prospective purchaser. The previous production estimates did not address the likelihood of double shift production methods being used. Actual employment will depend on the particular purchaser selected following auction of the timber. The following scenario is an estimate using assumptions based on other chipping operations in Region II.</p> <ol style="list-style-type: none"> <li>1. The sale will be logged in 64 days at a production rate of 20 acres/day, utilizing a configuration that has been typically used for chipping operations in the Mat-Su Valley, the Kenai Peninsula and on Aetna lands near Glenallen. Typical crew size is approximately 14 people per shift, running two 12- hour shifts per day to keep a single chipper in production. That yields approximately 22,000 man-hours for</li> </ol>

	meets the amount demanded AT THAT PRICE.	<p>the logging operation.</p> <p>2. The winter mainline road construction will take a three person crew approximately 800 man-hours to construct. The purchaser will also have to construct some spurs, landings, staging areas and perform maintenance to the road.</p> <p>The above figures yield an estimate of 23,000 man-hours or an average of 21 jobs for three months.</p> <p><i>Response continued in following rows:</i></p>
Geoffrey Parker	<p>Our clients request that you withdraw this proposed sale. The reasons supporting it are poor. The amount of timber, and the uses of it for chips and fuel, are insignificant. The sale anticipates creating only 11,690 person-hours of labor—which equates to about four full-time two-year jobs. That is insignificant compared to the permanent and likely impacts on recreation, fish and wildlife. Hence, the stated objective—to “help the state’s economy by providing... stumpage receipts [and] an infusion of wages, purchases, jobs, and businesses” – is a gross overstatement and far-fetched. The same can be said of the stated objective—to “help the local economy of communities in the Mat-Su Valley.” These objectives are not rationally met given the permanent impacts on recreation, fish and wildlife, all of which are far more important economic engines for the state and the Valley.</p>	<p>This timber sale was planned as a one-winter logging season. This sale would provide wood for a typical chipping operation, providing one winter season of harvest. The timber type in this area is not practical for harvesting sawlogs, but is appropriate for providing chips. The sale is aimed at chipping operations.</p> <p>Change made. <u>Taxes</u>. You are right, only property taxes are paid to the Mat-Su Borough. That statement has been corrected in the Final Finding. However, property taxes are paid by everyone in the Mat-Su Valley, whether indirectly by paying rent to a property owner, or directly by paying property taxes to the Mat-Su Borough.</p> <p><u>Comparison to other sales</u>. The DOF does not have a track record of sale purchases of this size in the Mat-Su to make a direct comparison with this sale. The small sales prepared in the last two years have all been sold to small operators. NPI and Huskywood Services have voiced significant interest over the last two years in purchasing a State sale of this size. A sale in the Houston area that had been unsold for two and a half years (due to timber quality and access costs) was purchased by NPI late last winter at fair market value. The price was developed from the adjacent small sales in the area. NPI has proven in the short term that it can pay for the timber at the prevailing local rates and utilize wood not marketable to smaller operators.</p> <p><i>Response continued in following row:</i></p>
		The DOF has generally kept pace with the timber

		<p>demand in the local market to prevent the associated problems that occur with an uncertain timber supply and to make the resources of Alaska available to the public. The size of the small state timber sales has generally kept NPI from actively pursuing them due to the economies of scale for the product they typically market (chips). The Mat-Su timber market is geographically isolated and has not developed to the point where a sale of this type and size would have an influence on the market price because of the lack of like sized competition. The capital needed to enter the area, the limited infrastructure to move the material to market, and the widely distributed resource has kept large operations from establishing themselves until the recent development of the NPI facilities.</p> <p>For information about timber harvest's impacts on recreation, fish, and wildlife, please see responses above in the following sections: "Anadromous Fish," "Wildlife," "Moose," and "Recreation."</p>
Denis Ransy	<p>How much will the state really make from this sale? We need a cost/benefit analysis to see if the state is actually making or losing money. How much has been spent to date, on planning and fieldwork?</p> <p>...</p> <p>As for the economics of things, it is unlikely that many locals will benefit. NPI would show up with complete crews from who-knows-where. "Local" to the area means Trapper Creek, Willow, and Talkeetna. The real economics of it are: NPI gets all the wood it wants. Then it goes to the port to justify the millions of public money spent there. With Port McKenzie looking important, the Knik Arm bridge will be encouraged, and it will have Don Young's name emblazoned on it. The whole thing stinks of political manipulation, if not outright corruption.</p>	<p>Estimates of revenue from the West Petersville #1 Timber Sale are shown below.</p> <p><b>Cost summary estimate:</b>  DOF planning: \$1,350  Timber sale layout contract: \$49,350  FLUP preparation: \$3,600  Contract preparation: \$1,350  Timber sale administration: \$5,184  Supplies (gas, etc.): \$2,000  Publishing cost: \$1,022  R&amp;B: \$1,400  <u>Subtotal: \$65,256</u></p> <p><b>Projected revenue</b> , based on <i>SFG</i> inventory:  Birch: \$32.71/acre  Spruce: \$25.80/acre  Subtotal: \$58.51/acre  1286 acres @ \$58.51/acre = <u>approx. \$75,240.</u></p> <p><i>Response continued in following rows:</i></p>

Becky Long	This sale will not make any significant contribution to the Trapper Creek local economy. This sale is NOT a source of raw materials for the local woods product industry. The wood will be chipped by NPI and exported.	Based on the <i>SFG</i> inventory, the projected revenue from this sale would be about \$75,240, which would be a net profit to the state of around \$10,000. However, during recent fieldwork and timber sale layout work, DOF has examined the sale area and believes that the volume of commercial timber in the sale area is lower than the <i>SFG</i> estimates. These lower volumes are likely to mean less revenue, which may even mean a net loss to the state.  <i>Response continued in following rows:</i>
Trapper Creek Community Council Board of Directors	The Board of Directors would also like to express concern on two other aspects of this sale:  1. Economics: Item P on page 11 of the PD cites economic benefits to be derived from this sale. None of these benefits will have a direct effect on our community. Similar sales in our area have produced no jobs for local residents and income from supporting services has been virtually nil. In fact, it appears the only effect the sale will have on our local economy will be negative.	However, we do not know the bid price for the sale, and these figures are only estimates. The revenue will depend on the bid price, which in turn will depend on competition for the sale, the DOF's requirements for site preparation after harvest, and the actual volume of the timber on the units.  <i>Response continued in following rows:</i>
Diane and Brian Okonek	Logging needs to pay its own way, including the cost of road maintenance and agency over site ensuring that logging operations follow contract requirements.	Our emphasis in the state timber sale program is to offer sales in a range of sizes to support the different types of timber businesses in the local area. Sale revenues are low because sales are targeted at local businesses. Guidelines to protect other resources and land uses increase costs for sale design, layout, and harvesting, and reduce timber revenue. Maximizing revenue generation from state timber sales would result in export of raw timber rather than local processing.  Also, see the responses to comments in the section on "Small sales" in this document. In addition to this large timber sale, the Division of Forestry will continue to offer small timber sales to supply small operators with timber. Offering a large timber sale to support the chipping industry does not decrease the opportunity for small sales to support small operators. Providing wood to support jobs for wood chipping does not eliminate other forestry jobs. In fact, selling large sales can increase the accessibility to more forested land, and can create more opportunities for small timber sales.  <i>Response continued in following row:</i>

<p>Arthur Mannix</p>	<p>Of primary concern, is the fact that, as you probably know, the Susitna forest is as marginal as you can get from a commercial standpoint. Although there are some "pumpkin patches" of choice timber (by Southcentral standards), our young, shallow soils, short growing season, relative lack of rainfall, slow-growing stands, lack of access, distance to markets, etc. are factors which, collectively, add up to a forest type that's not readily conducive to high volume logging.</p> <p>According to the January 1995 report "The Value of the Susitna Forest" by economist George Matz: "Large-scale timber harvesting in the Susitna forest is not economically justified without government subsidies. The Susitna forest itself presents significant obstacles to large-scale logging such as distance from markets, lack of infrastructure, and high timber harvesting costs. Because of the mosaic nature of the boreal forest, good commercial stands are mixed in with non-commercial stands, muskeg, rough terrain, and water. This increases the diameter of the logger's working circle and increases the cost to harvest." The study goes on: "Based on the volume of wood they require, only the small to medium-sized sawmills appear clearly within the State's limits of annual allowable cut." Likewise, in the 1985 Mat-Su Boro. Chijuk Creek Forest Mngmnt. Plan ( a 22,000 acre sale just south of Petersville, which failed and in which the Mat-Su Boro. is still in litigation) it states: "The extent of appropriations for road building and upgrading will determine the availability of access to meet acceptable cost-benefit timber management activities." The operator out at Chijuk Creek, Charles Nash, had on his staff, among others, a qualified forest engineer and U.A.F. Professor of Forest Silviculture. Much of the quality of timber out at Chijuk was lumber-grade birch which was being trucked to the railroad siding in Talkeetna, railroaded down to Seward, and shipped to a lumber mill in Shelton, Washington. It was higher value material than what most of the current sales have to offer, yet it proved to be economically untenable. After approximately 8 million board feet of material was left to waste, the borough initiated a belated, costly, and ineffective salvage operation.</p>	<p>The Borough's Chijuk Timber Sale was terminated because the purchaser failed to meet the production level specified in the contract for two years. The purchaser also left spruce on the ground for over a year, which was a breach of the timber sale contract and a violation of the Forest Resources and Practices Act.</p> <p>For a response to the comment about local hire, please see the response to Ruth Wood's comment, above, in the "Local workers" section.</p> <p><u>Value-added products.</u> The production of wood chips <i>is</i> a value-added timber product, and <i>is</i> being processed locally. AS 38.05.123(j)(2) defines "value-added wood product" as "round house logs, <u>chips</u>, green lumber, flitches, cants, rough planks, and other similar wood products..."</p> <p>See response to John Strassenburgh's comment below for an explanation of the state's commitment to in-state processing, rather than export. See also responses to comments in the "Export" section, below.</p>
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Arthur Mannix	<p>...</p> <p>As was the status quo prior to NPI's arrival, we had more jobs per volume of wood fiber extracted due to the local value-added component. Ten years ago, economist Matz found 336 jobs directly dependent on the Susitna forest. He estimated a plywood plant would generate only 80 jobs, a chipping operation even less- while jeopardizing the existing employment base, in requiring much more of the resource. The traditional extent of the locally-based wood products industry has always been compatible with other local, and now increasingly visitor-related uses of the forests.</p> <p>...</p> <p>I know foresters who have said that over the years they've offered a number of sales that no one has taken. perhaps because they weren't economically viable. Does it follow then, that the correct way to approach forestry development here is to wait until a large enough buyer comes along who can negotiate large sales for minimal stumpage fees? Because the value of the timber just isn't there?</p> <p>...</p> <p>Also, the facilitation, encouragement and development of the existing locally-based, value-added forest products industry, and more real cross-agency, adjacent landowner (government/private) engagement. I think that the forest industry here. even in these pecker-pole forests, can be vibrant and dynamic. if not large-scale.</p> <p>All of these criteria, however, require additional expense and increase the cost of the raw product to the consumer. All the more reason to more highly consider the priority of the local, value-added component. There is less distance to markets, there are more people employed per acre cut, there is less interference with other land-use values, and therefore it is less politically controversial.</p> <p>I would love to see some habitat and stand enhancement through active forest management here. To the public, acceptable terms for embracing the forest products industry require clarity, credibility and consent, little of which has been engaged with of late. Accountability must be high on the State's hierarchy of values. If the bottom line, i.e. the cost-and-distance-to-market versus the value of the timber equation doesn't accommodate post-harvest management of all of these issues mentioned, then perhaps, ethically, scientifically, and economically large-scale logging shouldn't happen in the Susitna Forest type.</p>	
Friends of Mat-Su	<p>This Forest Land Use Plan (FLUP) doesn't address the following:</p> <ul style="list-style-type: none"> <li>Consider adverse impacts on local businesses and doesn't address small niche businesses like birch syrup production that rely on a sustainable use of the forest.</li> </ul>	
Kenneth Marsh	<p>I am most upset over the State plan to harvest the large tract of timber on Petersville Road to haul down the road in chips and send off for such a low amount of money.</p>	

Sandra White	Local "jobs" created by industrial logging are minimal (none were created at the mile 108 cut) and very short-term, thus the cost-benefit to a local economy based in tourism is heavily weighted toward keeping the resource from being destroyed.	
Sheryl Salasky	<p>Provide a sustainable means of revenue (via selective cutting, supporting local businesses, tourism, recreational opportunities)</p> <p>...</p> <p>If timber extraction is to occur, PLEASE consider rewriting a document that addresses the above issues, NOT ones that invest the LEAST amount of time for the MOST amount of money.</p> <p>The immediate gain of clear-cutting should not overshadow the need for long term considerations (see above bullets). Also consider the negative impacts of timber extraction to ALL inhabitants (not just the humans who have mouths and money to promote large tract clear-cutting, but other ecosystem residents, too).</p>	
Krister Bowman	3) Local "jobs" created by industrial logging are minimal and very short-term, thus the cost-benefit to a local economy based in tourism is heavily weighted toward keeping the landscape whole.	
Rick Ernst	<p>4<sup>th</sup> Selling off our forests for wood chips to haul off to Asia is NOT a good way to manage our resources. We can get more from local loggers/acre for saw logs and other value added products without the attending mess that large corporate commercial cuts engender and that compromises the tourism economy we depend on.</p> <p>...</p> <p>5<sup>th</sup> Specifically, on a Planetary scale, Alaska is one of the last places on Earth that has a landscape little changed from the last Ice Age, this fact is what attracts people to the area not timber cuts! Our paradigm of what forests are for must change. We must shift from seeing our forests as primarily timber resources to a much broader outlook. One such designation is called Nontimber Forest Products and can be defined as biological material harvested from the forest that has not been produced from commercially sawn wood such as lumber, pulp and paper. Examples of this are birch syrup, berries, medicinal roots (Devil's Club), mushrooms, birch bark among many. Also the aesthetic of scenery and views of undisturbed vistas and landscapes of forests have a value that can be measured in its attraction for visitors to our land.</p>	
Cascadia	This timber sale is much too large. Elsewhere in Mat-Su tens of acres are sufficient to keep businesses in operation, year-round and for generations. Why does NPI need thousands of acres? The fact that NPI needs this scale of landscape to operate goes to show just what a low-end product they are producing. Their approach is very highly mechanized, employing more machines and computers than Alaskans. This is just not very efficient fiber production or jobs creation.	Chipping operations require large volumes of wood. Small timber operators harvesting sawlogs require higher-quality and lower volume. The DOF offers both types of sales. See also response to comments above in this section.



	<p>...</p> <p>The state needs a more useful way to determine the need for public-land timber sales, than whether or not they sell. If NPI logs this state land, will that be in addition to, or instead of, private and trust land logging? Will you be spurring the industry on, or giving it a hand-out at the expense of local landowners. Please guard the state against needlessly giving public resources to the industry, for no reason.</p>	<p>The state timber sale program is in addition to trust and private land. The state does not control what other landowners decide to do with their land.</p>
John Strassenburgh	<p>Second, the West Petersville #1 FLUP on page 12 makes reference to timber sales in the Mat-Su District. Would you send me, please, an accounting showing the costs to the state and the revenues to the state of each sale in the Mat-Su District in the past two years. What I am interested in for each sale is the actual costs incurred by DoF for preparing, administering, and reforesting the sale and the dollar return that was realized by the state (DoF).</p>	<p>In the past two years (FY04 and FY05), DNR sold 5 timber sales in the Mat-Su area at the following prices:</p> <p>Poppert #2 – 45 ac - 25 MBF - \$1,135</p> <p>Sunset Mill #3 – 50 ac - 93 MBF - \$4,167</p> <p>Houston #1 – 640 ac - 67 MBF - \$3,015</p> <p>Houston 00-1 – 70 ac - 1,421 MBF - \$4,900</p> <p>Houston 02-1 – 400 ac - 377 MBF - \$16,965.</p> <p>Total – 1,205 ac – 1,981 MBF - \$32,912</p> <p>Sale costs are not allocated by individual sale, but by program. However, sale costs average \$20 to \$22/ac, including costs for sale layout, sale administration, field inspections, pre-planning, and preparation of FLUPs and contracts. Based on these averages, costs for the above sales would total \$24,100 to \$25,500, and revenues totaled \$32,912.</p> <p>Our emphasis in the state timber sale program is to offer sales in a range of sizes to support the different types of timber businesses in the local area. Sale revenues are low because sales are targeted at local businesses. Guidelines to protect other resources and land uses increase costs for sale design, layout, and harvesting, and reduce timber revenue. Maximizing revenue generation from state timber sales would result in export of raw timber rather than local processing.</p>
Sandra Kogl	<p>The logging industry needs to be financially secure enough to sustain itself without major subsidies. Whenever terms of sales cannot be adequately met or enforced, the sale should not take place. Certainly the mass chipping of our trees and shipping the product to Korea is a short sighted plan. Encouraging local harvesters to pursue the production of value-added timber products seems more responsible than current practices.</p>	<p>See response to comment above about the state's commitment to in-state processing, rather than export.</p> <p>The production of wood chips <i>is</i> a value-added timber product, and <i>is</i> being processed locally. AS 38.05.123(j)(2) defines “value-added wood product” as “round house logs, <u>chips</u>, green lumber, flitches, cants,</p>

		rough planks, and other similar wood products...”
	<b>Export</b>	
Ruth Wood	The proposed sale does not provide raw materials (logs and chips) for local manufacturers. Instead, it provides chips to be shipped to Korea.	The sale provides raw materials to a local processor to produce chips, which are a value-added wood product [AS 38.05.123(j)(2)] (See also response to Sandra Kogl, above). In addition, the purchaser of the sale can sell sawlogs to the local mills if there is a demand.
Cascadia Wildlands Project, Gabriel Scott	<p>We strongly oppose the proposed timber sale because it offers a terrible return on the investment. These forests are worth most to us as fish and wildlife habitat, water purifiers, a place to hunt and to play, and to live— rather than being chopped apart to make Korean cardboard and Japanese newsprint.</p> <p>...</p> <p>We are concerned that the state is veering from the path of sustained yield, in order to fill the short-term profits realized with chip exports. Our comments on the recent 5-year schedule outline that concern. Clearly there is room for timber sales in Mat-Su, but this program is unsustainable if done on the scale NPI needs to keep up a chip operation. This sale by itself should be looked at with caution, in that broader context.</p>	<p>See “General response to comments,” page 2 of this document, for an explanation of the planning processes that determined how multiple uses would be accommodated in the Susitna Valley.</p> <p>Change made. Added a new section to the FLUP: E.Planning Framework.</p> <p>Change made. Additional explanation added to the FLUP: By law, the state must manage timber for sustained yield. The annual allowable cut that is sustainable in this area is set by the <i>Susitna Forestry Guidelines</i> at 880-930 thousand cubic feet (Mcf) per year (see p.11, chart and “Sustained Yield”). State harvests in any five-year period must be no greater than five times the annual allowable cut. Because sales in the last four years have been far below the annual allowable cut, the remaining allowable cut in FY06 is 3,649 to 3,899 thousand cubic feet. The West Petersville sale contains 900.2 thousand cubic feet, well within the allowable cut.</p> <p>In the boreal forest, large-scale disturbances (whether by fire, insects, or windstorms) are the way these ecosystems maintain their productivity. Timber harvest provides another mechanism for this disturbance.</p>
	<b>Market demand</b>	
Ruth Wood.	The assessment of market conditions is ridiculously inadequate. There is no local manufacturing or raw lumber demand. The only demand is for chipping to be exported to Korea. NPI is the only interested bidder. One bidder does not make a market. One bidder makes for low prices.	<p>See “General response to comments,” page 2 of this document, for an explanation of the planning processes that determined how multiple uses would be accommodated in the Susitna Valley.</p> <p>Change made. Added a new section to the FLUP: E.Planning Framework.</p>

		<p>The sale provides raw materials to a local processor to produce chips, which are a value-added wood product [AS 38.05.123(j)(2)].</p> <p>This area has been classified to allow timber harvest. The state is interested in actively managing this area, and for the first time, we have a market for this timber. If the timber is not harvested, the timber value will decrease, as will the market price. Waiting does not get us a higher price for this timber.</p>
	<b>Small sales</b>	
Denis Ransy	The small communities of the Su Valley will be a lot better off if small lots were made available to locals for firewood, building logs and rough-cut lumber. NPI would be kept busy harvesting the beetle-killed trees on the Anchorage hillside to save them from forest fire.	<p>In addition to this large timber sale, the Division of Forestry will continue to offer small timber sales to supply small operators with timber. Offering a large timber sale to support the chipping industry does not decrease the opportunity for small sales to support small operators. Providing wood to support jobs for wood chipping does not eliminate other forestry jobs. In fact, selling large sales can increase the accessibility to more forested land, and can create more opportunities for small timber sales.</p> <p>In terms of small sales that are being offered, the Houston 2005 Timber Sale will be advertised in the near future.</p> <p>See “General response to comments,” page 2 of this document, for an explanation of the planning processes that determined how multiple uses would be accommodated in the Susitna Valley.</p> <p>Change made. Added a new section to the FLUP: E.Planning Framework.</p>
Arthur Mannix	Another problem with the newly heightened rates of timber sales and cutting, is that they are, politically, very unpopular here. In all of the 25 years that we, and the other small operators, have been working here we've had no complaints. Indeed, the Borough-funded Resource Management Associates (RMA) survey stated: "79.2% of those interviewed wanted the Boro. To build upon the small logging operations that currently exist in the Boro. Rather than attract large national operations." Likewise, the State, in May of 1991, during the drafting phase of the <i>Susitna Forestry Guidelines (SFG)</i> , a Newsletter: Response to Public Comments, stated under "The Big Issues": "Almost half the comments received were concerns about the scale of logging. most said that logging should be small-scale, local operations."	
Sandra White	Local log builders and value-added businesses end up creating a greater economic return per acre logged.	
Krister Bowman	Local log builders and value-added businesses end up creating a greater economic return per acre logged.	
Cascadia	To the extent the purpose of this project is helping the local economy, the local economy is best served by small-scale, local use of forest products, tourism and recreation. Mowing the forest down to make cardboard in Korea is an awfully crummy return for local communities. Supporting the local timber industry is a respectable goal, but if you are using public resources then subsidize small, local operators and sustainable operations, not multinationals in it for a quick profit.	
Kenneth Marsh	This is a rip-off for the local folks who could at least be allowed to go in first and take out the large spruce for logs and firewood. Your plans are great on paper for your department and for backing up your school taught forestry experts but not for us who live here.	See responses to comments above. The purchaser of the sale can sell sawlogs to the local mills if there is a demand.

	Silvicultural prescription	
Ruth Wood	The harvest methods specified are inadequate to protect the long term viability of the forest. Allowing the logger to take all trees 5” in diameter or larger is another way of saying you are allowing clear-cutting. No trees smaller than 10” in diameter should be harvested. There is no provision to identify, flag, and leave seed trees. State foresters should identify islands of trees with healthy trees to be left as seed areas. There is a requirement to meet state standards for open burning, but no requirement to follow Mat-Su Borough requirements. I object that scarification will only be required where economically possible. Scarification should be required regardless of whether it is economical or not. Where it’s not economical to scarify, logging should not be allowed, plain and simple. This FLUP doesn’t even say who gets to determine whether it’s economically possible to scarify.	The timber harvest has been designed as required by the <i>Susitna Forestry Guidelines</i> . Forest management in the Susitna Valley is designed to create and maintain a mosaic of age classes that will provide for a mixture of cut and uncut areas to provide and protect fish and wildlife habitat, and produce timber.  The clearcutting is being done in small units, with irregular borders, as per the <i>SFG</i> . The sale area is made up of 35 units. The average size of the units is 37 acres, and the size ranges from 11 to 58 acres. In the few units that are larger than 50 acres, islands of timber will be included in the final layout of the unit so that the harvested area is less than 50 acres. As mandated by the <i>Susitna Forestry Guidelines</i> , each cutting unit is surrounded by unharvested strips at least 330 feet wide. These guidelines were designed to provide for wildlife habitat and for reforestation by natural reseeding.
Friends of Mat-Su	This Forest Land Use Plan (FLUP) doesn’t address the following: <ul style="list-style-type: none"> <li>Does not contain an option/alternative that allows buffers to be increased or seed tree islands selected in advance by the Division of Forestry not at the discretion of the contractor</li> <li>Scarification to allow for regeneration within the harvested area.</li> </ul>	
Kenneth Marsh	Also you are taking smaller trees than even the Borough is taking....why not just say you are clear cutting? You are not fooling us.	Change made. Added requirement for scarification to the Final Finding as follows:
Brian and Diane Okonek	The practice of having uneven edges along the perimeters of the cut areas is good. Leaving islands of trees standing in cut areas will make the cut areas less noticeable from the air, leave more habitat for wildlife and ensure the survival of seed trees. ... If scarification is the best technique to ensure for healthy regeneration of the forest then why is stated on page 9 under Regeneration that "Scarification will be done where economically possible" instead of scarification being required? If it is not economically possible to under take logging in the most environmentally sound way then it should not be done at all.	Scarification will be done on the harvest units to the standards set in the <i>Susitna Forestry Guidelines</i> to ensure regeneration that meets the reforestation standards in the Alaska Forest Resources and Practices Regulations [11 AAC 95.375 - .390]. As mandated in the <i>Susitna Forestry Guidelines</i> , mineral soil must be exposed on at least 50% of the harvested area. Areas should be scarified no later than two growing seasons following completion of harvest to minimize grass invasion. Mineral soil patches should be exposed uniformly over the harvested area to encourage uniform distribution of trees. Mineral soil patches should be as large as possible.
Krister Bowman	10) Isolated "seed trees" in the upper Valley's ecosystem where 10 to 20 feet of snow is common (breaking branches and trunks) and where winds can and have reached 85 mph are far less effective than seed tree islands and smaller-scale harvests with proximate old growth edges.  11) Scarification is untested and unproven in the forests of the upper Su Valley. Since its effects are unknown, it must be given years to study before proceeding. The alternative-- no scarification, leaving the soil unturned for the natural re-seeding-- is equally untested. Harvests of this scale are an experiment with our resources that are wrong.	<u>Uneven edges.</u> The FLUP notes that the timber harvests were laid out with uneven edges to benefit wildlife, as recommended in the <i>SFG</i> (p. 19), which will make the harvest areas look more natural from the air. The harvest area will not be visible from the Petersville Road. Please see the “Tourism” section for more

Arthur Mannix	<p>Recently, subsequent to public discontent and outcry, the Boro. postponed a 900 acre sale on Montana Creek and has gone back to the drawing board on the public input process. I believe NPI is giving logging in this area a bad image. Among other things, it's scarification techniques leave much to be desired. I know, I've planted a lot of spruce here myself and know what a good regenerative seedbed for the spruce/birch forest-type looks like. (We've had UAF Forester Tony Gasbarro down to discuss reforestation techniques here, as well.) Also, the ways the cuts are being laid out needs to overlap with, and accommodate the enhancement of other values of the forest. More convoluted, rather than straight-line edges, some forested "islands" within the sales, which would actually enhance future forage/cover opportunities for moose. rather than paying simple lip service to it. would go a long way towards making forestry options politically more palatable here on these ever increasingly more popular and visited lands.</p> <p>...</p> <p>Given the commercial marginality of the Susitna forest, a number of criteria must be met: Properly prescribed and executed post-harvest scarification/burn actually employed and monitored (which is site and soil specific!), sale layouts which consider wildlife/aesthetic/scenic overflight values.</p>	<p>information about the impacts of the timber harvest on scenic values.</p> <p>Change made. More information about scarification added to the FLUP, as well as a new section called "Silvics of birch trees." This section explains that Alaskan birch regeneration is much better on scarified sites three years after clearcutting than on unscarified seedbeds. In Zasada's (1978) study of Alaskan birch regeneration three years after clearcutting, 100% of the scarified plots measured had seedlings while only 30% of the unscarified sites had seedlings. The seedlings in the scarified sites averaged 11 inches in height while the untreated sites averaged 2 inches (Zasada, 1977).</p> <p>Bluejoint reedgrass (<i>Calamagrostis canadensis</i>) in Southcentral Alaska is a serious competitor of both spruce and birch regeneration. Its rhizomes and seeds quickly colonize sites. The grass robs seedlings of needed nutrients and light. The dead grass also will smother the seedlings, and with the winter snows, may break or severely damage the young, weak plants. Scarification retards grass colonization and allows the seedlings to become established and compete with the grass.</p>
Sandra White	<p>"Scarification"-- digging up the logged soil to allow for "better" regrowth (see the mile 108 cut with its foot-thick, three-foot-wide slabs of frozen backhoed earth)-- is untested and unproven in the forests of the upper Su Valley. Since its effects are unknown, it must be given years to study before proceeding. The alternative-- no scarification, leaving the soil unturned for the natural re-seeding-- is equally untested. Harvests of this scale are an experiment with our resources that are wrong.</p>	
Mr. & Mrs. James Denison	<p>It matters little whether the road building and clearcutting is done piece-by-piece or in huge tracts, the ultimate result is the same: fragmentation and devastation of wilderness areas—the ones so many of us travel so many thousands of miles—at great expense—to see and experience—and the vanishing wildlife we hope to see.</p>	<p>See "General response to comments," page 2 of this document, for an explanation of the planning processes that determined how multiple uses would be accommodated in the Susitna Valley.</p> <p>Change made. Added a new section to the FLUP: E.Planning Framework.</p> <p>Birch is an important food source for wood-eating mammals such as beaver, moose, snowshoe hares and porcupines. These herbivores are not only dependent on young hardwoods (early successional stage) for food, but the animals themselves are, in turn, major food sources for predators (Collins, 1996). In Southcentral Alaska, the most significant factor promoting the maintenance of early successional vegetation has been fire. Fire suppression for the last few decades has</p>

		severely reduced this mode of hardwood production, and as a result, has changed the diversity and productivity of the boreal habitats and their wildlife (Collins, 1996). Reduction of overstory and ground covers by logging or land clearing can mimic the natural disturbances which stimulate hardwood growth (Collins, 1996).
	<b>Annual allowable cut</b>	
Becky Long	Not having this sale would not affect the AAC for the East Side Phase I of the <i>SFG</i> . This is because minus the West Petersville Rd. sales, the timber sales for 2005-2009 would be 7305 acres which is still over the approximate 4950 acres allowed by <i>SFG</i> for 5 years of cutting. I would like to see an AAC set specifically for the Petersville Road units 1A and 3A in order to assure us that there is sustained yield with commercial and personal use.	<p>By law, the state must manage timber for sustained yield. To ensure that we manage sustainably, DNR establishes an annual allowable cut for each management area. Allowable cuts are set over an area that is large to manage sustainably, efficiently, and with enough flexibility to design sales to meet demand while mitigating impacts on other uses. Individual units are too small to meet these criteria.</p> <p>Within the <i>Susitna Forestry Guidelines</i>, the allowable cut is split into three phases, and the first phase is split into the Mt. Susitna and East Side area. The West Petersville sale is in the East Side area of Phase 1.</p> <p>The annual allowable cut that is sustainable in this area is set by the <i>Susitna Forestry Guidelines</i> at 880-930 thousand cubic feet (Mcf) per year (see <i>SFG</i>, p.11, chart and “Sustained Yield”). State harvests in any five-year period must be no greater than five times the annual allowable cut. Because sales in the last four years have been far below the annual allowable cut, the remaining allowable cut in FY06 is 3,649 to 3,899 thousand cubic feet. The West Petersville sale contains 900.2 thousand cubic feet, well within the allowable cut.</p>
	<b>Rotation age</b>	
Ruth Wood.	The proposed sale is not in the public’s interest because the public opposes the sale. The proposed sale will not sustain and promote a healthy, long-term timber industry in the state because forests grow slowly here. It will be 100 years before this forest regrows enough to log again. That’s not exactly sustainable.	The regular rotation age for birch is 80 years, and for spruce, is 100 years. The proposed sale is within the annual allowable cut, and will allow sustained use of the forest over the long term. The harvest units would not be

Arthur Mannix	According to the Susitna Forest Guidelines: "Little information exists on reforestation that is specific to the Susitna Forest. Grass competition, browsing, and wet soils can hinder both natural regeneration and planting." Currently, NPI is harvesting volumes of less than middle-ages stands of spruce without allowing them to reach maturity. Blanket large-scale sales provide many more long-term questions with minimal short-term benefits to the general public.	harvested again until at least as long as the standard rotation age. The standard rotation approximates the age at which timber is mature enough to provide natural regeneration and large enough to provide a mix of wood products such as fuelwood and sawtimber.
Kenneth Marsh	We are told that these forests are old, that they need this, etc. And if we just wait 60 or 80 years they will be grown back so nice. Great news but I and most people here will not be around to see this. I like the old forest. I like it natural. I did not come to Alaska 40 years ago to see you clear cut big areas to send to Korea for peanuts and make tree farms or bare ground.	Birch is considered a short-lived tree, and matures at 60 to 70 years old. It rarely lives longer than 140 to 200 years. The birch in the sale area are estimated to be between 110 and 130 years old.  Change made. A new section has been added to the FLUP: Silvics of birch trees.
Krister Bowman	4) The time scale for forest regeneration is at least two generations (state foresters concede this point), and the result in 50 years will likely be "birch bamboo" forests of small tightly spaced trees, precluding for many generations the development of old growth stands that now exist.	Please see also the responses to comments in the "Silvicultural prescription" section for more specifics about grass competition and scarification.  Also, see "General response to comments," page 2 of this document. The Department of Natural Resources has, through many broad-scale planning efforts, identified areas where timber harvest is an allowed use, as well as many areas where timber harvest is not allowed.  Change made. Added a new section to the FLUP: E.Planning Framework.
Becky Long	I would like to know if this area is being managed for standard or long rotation for white spruce and birch.	The mix of long and short rotation ages required by the <i>SFG</i> is addressed in two ways. First, the allowable cut for the Phase 1 area is based on harvesting 60% of the areas where forestry is a co-primary use on a long rotation, and 40% on a short rotation. This means that across all co-primary units in phase 1 there will be at least 40% of the area in long rotations. However, individual acres are not designated in advance as "long rotation" or "short rotation" sites. Second, at least 40% of each subunit must be kept in cover habitat at all times. In the Petersville Road 1a subunit, there are 11,360 acres of forest cover, and only 1,286 acres (11%) are scheduled to be harvested in the West Petersville #1 sale.
<b>Forest health</b>		
RDC	RDC believes this sale will not only benefit the timber industry and the Mat-Su	Comment noted.

	<p>economy, but will also contribute to healthy forest regeneration and enhance wildlife habitat:</p> <ul style="list-style-type: none"> <li>• This selective logging sale will improve forest growth and vigor by harvesting and replacing mature birch and spruce stands with new healthy stands of re-growth, while protecting and maintaining other resource values.</li> <li>• The units are fully stocked and are declining in net volume due to the natural decay cycle of timber at maturity and generally are only capable of being utilized to supply timber for fiber, chips, or fuel wood.</li> </ul> <p>Scarification will be performed to promote the germination and growth of hardwoods including birch, aspen, and willow.</p>	
Denis Ransy	<p>Your description of the trees makes it sound like a terrible plant disease is running rampant through the area, as if birch trees getting large and old is an epidemic. An old growth forest is not evidence of a “dying” forest, but then again it is not the “tree farm” that the foresters would like it to be.</p> <p>...</p> <p>Your rap on regeneration is pure forester propaganda. You act like new tree growth is impossible without either logging, or fires. I have seen a lot of undisturbed old growth in the Susitna Valley, and there are always birch and spruce seedlings and saplings coming up. Your implication that old growth represents a “dying forest” is absurd. However, it does provide you with convenient pro-logging arguments.</p>	<p>Change made. Changes were made to the FLUP to clarify that it is the commercial timber volumes that are declining. This sale is not being sold as a salvage sale.</p> <p>Also, see “General response to comments,” page 2 of this document, for an explanation of how broad-scale land use decisions will ensure a mosaic of stand ages and types.</p> <p>Change made. Added a new section to the FLUP: E.Planning Framework.</p>
Friends of Mat-Su	<p>This Forest Land Use Plan (FLUP) doesn’t address the following:</p> <ul style="list-style-type: none"> <li>• Long term health of the forest</li> </ul>	<p>Change made. Added a new section to the FLUP (Section A.4.) called “Silvics of birch trees” that describes the life cycle of birch trees, and explains how timber harvest and scarification can help provide excellent opportunities for regrowth. See that section of</p>
Sheryl Salasky	<p>Maintain a healthy forest ecosystem (habitat buffers, proper reforestation techniques, watershed concerns, etc).</p>	



Cascadia	<p>What is the basis for saying this sale would improve forest health? The mosaic pattern of forest and muskeg here has been created over time, and is still being created according to a forest succession we only sort-of understand. Interrupting that process on such a large scale will not improve forest health. "Healthy" forest means more than "fast-growing." It would be inaccurate to characterize this as a salvage sale.</p>	<p>the FLUP for more description of birch and its regrowth.</p> <p>Birch is considered a short-lived tree, and matures at 60 to 70 years old. It rarely lives longer than 140 to 200 years. ADFG estimates the birch trees in the sale area to be between 110 and 130 years old (Collins, pers. comm.). Birch commonly colonizes disturbed sites found after logging, fires, and windstorms. Scarification techniques are used to mimic or augment these disturbances and ensure adequate stocking levels to meet management and regulatory goals.</p> <p>By mimicking some aspects of the fire regime of the past, the harvest will create more forest diversity, leaving an older, late successional forest with approximately 30-acre cuts dispersed throughout the area. The early successional wildlife species such as moose will benefit from the disturbance and subsequent browse, while buffers and leave areas will continue to support species adapted to the late successional forest types. Buffers will also act as travel corridors and provide cover for wildlife (Collins, ADFG, pers. comm.).</p>
Cascadia	<p>Slash and logging increase the risk of a bark beetle outbreak. Scattering spruce slash through the unit would provide beetles with ideal breeding conditions. This is one of the few areas not severely impacted by spruce bark beetles, and we'd like to keep it that way. Please include strict provisions about disposal of spruce slash.</p>	<p>The disposal of slash will be done in compliance with the Alaska Forest Resources and Practices Act and its regulations, which contains specific guidelines to minimize the spread of destructive forest insects. 11 AAC 95.195 states that a landowner must perform one or more of the following practices within one year unless notified by the division, if clearing spruce trees other than black spruce:</p> <ul style="list-style-type: none"> <li>(1) spruce trees or limbs greater than five inches in diameter may be disposed of by manufacturing into cants, lumber, houselogs, chips, or firewood;</li> <li>(2) spruce trees or limbs greater than five inches in diameter may be disposed of by burning, subject to applicable regulations;</li> <li>(3) downed and removed spruce trees or limbs greater than five inches in diameter may be treated or stored in an appropriate manner, if they are not burned, manufactured, or otherwise used in a way that will prevent the spread of bark beetles;</li> </ul>

		(4) spruce limbs greater than five inches in diameter may be dried by uniform scattering in areas open to sunshine if they are not burned or chemically treated.								
	Reforestation									
Mr. & Mrs. James Denison	If Alaska is so concerned about jobs, how about using some of those many millions of taxpayer dollars we're spending to have our forests destroyed—to hire these woodsmen to restore acreage that has already been clearcut?	<p>According to the Alaska Forest Resources and Practices Act and its regulations, when timber is commercially harvested, it must be reforested [AS 41.17.060(b)(4)]. The specific reforestation requirements for public land are set in the Alaska Forest Resources and Practices Regulations [11 AAC 95.375 - .390]. For Region II (Southcentral Alaska), a harvested stand must be reforested within seven years using the following standards:</p> <p>1. Vigorous, well-distributed residual commercial trees free from significant damage meet or exceed the following standards, or a combination of trees and seedlings approved by the division, meet the following standards:</p> <table><tr><td>Average DBH of Remaining Stand – Inches</td><td>Minimum Stocking Standard (trees/acre)</td></tr><tr><td>Greater than 9</td><td>120</td></tr><tr><td>6 to 8</td><td>170</td></tr><tr><td>1 to 5</td><td>200</td></tr></table> <p>2. The number of vigorous, undamaged, and well-distributed seedlings of commercial tree species must average a minimum of 450 trees per acre and must have survived on site for a minimum of two years.</p> <p>3. Adequate reforestation means a combination of seedlings and residual trees that will meet the standards set out above.</p> <p>4. No more than 10 percent of the harvest area or contiguous areas may be below the stocking levels as set out above.</p> <p>-----</p> <p>In many cases, with adequate site preparation techniques such as scarification, natural regeneration exceeds the required regeneration standards, so planting is not</p>	Average DBH of Remaining Stand – Inches	Minimum Stocking Standard (trees/acre)	Greater than 9	120	6 to 8	170	1 to 5	200
Average DBH of Remaining Stand – Inches	Minimum Stocking Standard (trees/acre)									
Greater than 9	120									
6 to 8	170									
1 to 5	200									

		necessary.
Cascadia	Regeneration is a concern here, especially give the scale of proposed logging. You report the 30-acre unit logged in the 1980s, adjacent to the sale area, is having trouble regenerating. Mechanized logging on this large scale could cause a very large problem, if succession does not follow quite how you'd like it to. There are lots of other stresses on this landscape, including climate change, and deforestation from spruce bark beetles and human population. The forest will be most healthy and able to respond to these stresses if it isn't covered in roads and clearcuts.	<p>The nearby 30-acre sale logged in the 1980s was small enough that the moose overbrowsed it because there was not much other young birch available for browse in the area. The trees have had a hard time growing past the browse line. The current sale is much larger, so there will be plenty of browse for moose without danger of any areas being overbrowsed.</p> <p>Change made: Added explanation to FLUP about moose overbrowsing the smaller sale, and clarified that the trees have had difficulty growing past the browse line.</p> <p>See other responses to comments in this section “Reforestation,” and the “Forest health” section.</p>
John Strassenburgh	Fourth, the forest regeneration requirements specified in the Plan are inadequate. In order to better ensure proper forest regeneration, the Division of Forestry personnel should, prior to commencement of operations, flag islands of seed trees to be preserved seed trees. The contractor is driven by profit and cannot therefore be relied upon to save suitable groups of seed trees. Division of Forestry must do this and it must be so stipulated in the FLUP. In addition, (page 9) scarification must be done where it is needed to ensure the proper regeneration; not just “where economically feasible.” Who and what determines what is economically feasible? This language couldn’t be more favorable to the contractor had they written it themselves.	<p><u>Islands of seed trees.</u> The sale area is made up of 35 units. The average size of the units is 37 acres, and the size ranges from 11 to 58 acres. In the few units that are larger than 50 acres, islands of timber will be included in the final layout of the unit, so that the harvested area is less than 50 acres. As mandated by the <i>Susitna Forestry Guidelines</i>, each cutting unit is surrounded by unharvested strips at least 330 feet wide.</p> <p><u>Scarification.</u> Change made. Scarification requirements have been added to the FLUP:</p> <p>The regeneration of the timber sale area is the responsibility of the DOF, not the purchaser. As mandated by the <i>Susitna Forestry Guidelines</i>, the timber sale has already been designed to provide adequate natural seed from trees left in unharvested strips between the small (less than 50 acre) cutting units.</p> <p>Scarification will be done on the harvest units to the standards set in the <i>Susitna Forestry Guidelines</i> to ensure regeneration that meets the reforestation standards in the Alaska Forest Resources and Practices Regulations [11 AAC 95.375 - .390]. As mandated in the <i>Susitna Forestry Guidelines</i>, mineral soil must be exposed on at least 50% of the harvested area. Areas should be scarified no later than two growing seasons following completion of harvest to minimize grass invasion. Mineral soil patches should be exposed</p>

		<p>uniformly over the harvested area to encourage uniform distribution of trees. Mineral soil patches should be as large as possible.</p> <p>The DOF will monitor the post-harvest regeneration and will take measures to promote reforestation if performance of the regrowth indicates poor stocking. Each site will be evaluated to the requirements of the Alaska Forest Resources and Practices Act for reforestation. On the whole, the DOF believes natural regeneration will be sufficient in the sale area given experiences with other sales in the area.</p> <p>See also the response, above, to Mr. and Mrs. Denison for a summary of the reforestation requirements that must be met by the DOF.</p>
	<b>Invasives</b>	
Becky Long	<p>We must clarify if scarification is necessary and if so how should it be done on a case by case basis. The scarification at the borough timber sale at Milepost 108 by digging up with a backhoe plugs of land approximately 8 inches by 3 feet seems like guaranteeing a recipe for the establishment of invasive species. This must be considered immediately.</p> <p>...</p> <p>The USDA Cooperative Extension Service people and the Upper Susitna Soil and Water Conservation staff funded by federal grants are going around to all the community councils up here about the terrible invasive plan species problem. I think borough and state logging are creating more problems.</p>	<p><u>Invasives</u>. Changes made. Added guidelines on protecting against the spread of invasive species:</p> <p>Because the harvest will occur during the winter, when plants are covered with snow, the harvest activities do not have a high likelihood of spreading invasive seeds from plants that are already present in the area. However, if timber harvest equipment will be coming from outside Forestry Region II (and therefore have the potential to spread seeds coming from outside the Valley) it will be power-washed to remove possible</p>

Krister Bowman	5) Invasive species thrive in disturbed land. Invasive species are a big concern to many, and increasing exponentially in the Susitna Valley. The potential for regrowth becoming nothing like what was "planned" is large and alarming	invasive species seeds before it is allowed on-site.  Scarification has a greater likelihood of transporting local invasive plants' seeds, especially if it is done in the summer. Scarification equipment will be power-washed before going on-site. In addition, if scarification is done in the summer, the area along the Petersville Road and the old logging road will be checked before scarification equipment is brought into the timber harvest area in the summer, to see if there is an infestation of invasive species at the entrance to the timber sale. If there is, the infestation will be treated prior to the scarification work being done. Because the closest unit to the road is a half-mile away, there is little danger that seed from the Petersville Road will be blown into the scarified areas.  <u>Scarification</u> . Changes made. Added scarification requirements to Final Finding. See response to John Strassenburgh, above, for details on scarification.
<b>Buffers</b>		
Mat-Su Borough	The proposed timber sale area is located within the Trapper Creek Community Council boundaries. The draft Trapper Creek Comprehensive Plan generally suggests:  a. The required retention of vegetated buffers on public lands as outlined in the Matanuska-Susitna Borough/State of Alaska MOE for the Parks Highway and Petersville Road.	Change made. Added to FLUP: The timber sale will be accessed by an existing road off the Petersville Road. There will be no change to the Petersville Road or the Parks Highway.
Friends of Mat-Su	This Forest Land Use Plan (FLUP) doesn't address the following: • Does not require adequate no-cut buffers along adjoining private property (200 feet at least)	There is no private property adjacent to (or within a quarter of a mile of) the timber sale.
John Strassenburgh	Eighth, the FLUP should require no-cut buffers of 200 feet along adjoining private property.	
<b>Cumulative impacts</b>		
Ruth Wood	I object to the statement that the sale by itself is not expected to cause significant negative impact on wildlife. Life doesn't happen in a vacuum. There is a great deal of development being planned for the northern Susitna Valley. What will be the cumulative impact?	See "General response to comments," page 2 of this document, for an explanation of the broad-scale planning efforts that ensure the full range of uses of this area.  Change made. Added a new section to the FLUP: E.Planning Framework.

	Multiple use	
Brian and Diane Okonek	<p>The Susitna Area Plan land use designation and management for the proposed logging area is for multiple use purposes. The plan allows for timber harvest, but at the same time protects other uses of the forest resource. Since logging is such a industrial use of the forest that can have many adverse impacts on all other uses of the public woodlands it needs to be carefully planned, regulated and enforced. We do not feel the the FLUP fully protects other uses of the forest.</p> <p>Item 3 under Objectives on page 3 states "To help the local economy of the communities in the Mat-Su Valley." It should go on to state that timber harvest should not adversely effect the existing economy of these communities.</p>	<p>See "General response to comments," page 2 of this document, for an explanation of the broad-scale planning efforts that ensure the full range of uses of this area.</p> <p>Change made. Added to FLUP: Because so much of the Susitna Valley was classified for multiple uses (e.g., habitat, forestry, recreation, water resources), the <i>Susitna Forestry Guidelines</i> were developed in 1991 to clearly define how timber harvest would be done to protect the other uses. The <i>SFG</i> recognizes the importance of non-timber values in the area, and protects them while providing access to timber resources.</p>
Sandra White	Many uses exist already on the proposed "multiple-use" lands slated for wood-chip logging: hunting, fishing, hiking, snowmachining, skiing. These uses would be precluded by the timber sale.	
Krister Bowman	Many uses exist already on the proposed "multiple-use" lands slated for wood-chip logging: hunting, fishing, hiking, snowmachining, skiing. These uses would be precluded by the timber sale.	See also responses to comments in the "Recreation" section, above.
	Safety equipment	
Denis Ransy	Speaking of sinking cats, are loggers required to stock oil boom and other clean-up supplies in case of diesel or oil spills? There would be thousands of gallons on the site during operations.	<p>The timber sale contract will clearly state the requirements for the containment of all hazardous materials. The DOF, through contract administration, will execute the intent of the contract through regular inspections and through additional "as needed" visits to the site to ensure compliance by the purchaser with all aspects of the contract. The contract will also contain bonding and insurance amounts proportional to the risks as evaluated by the DOF.</p> <p>The contract will require that the operator have adequate spill response material on hand to deal with the fuel that he has on-site.</p>
	Compliance monitoring	
Friends of Mat-Su	<p>This Forest Land Use Plan (FLUP) doesn't address the following:</p> <ul style="list-style-type: none"> <li>No provision for monitoring and enforcement of guidelines by the Division of Forestry in the FLUP.</li> </ul>	The DOF is already required by the Forest Resources and Practices Act (FRPA) to monitor timber harvest operations for compliance with the Act and its best management practices (regulations). A separate

John Strassenburgh	Fifth, there is no provision for monitoring of operations and enforcement of guidelines. The Division of Forestry should be monitoring the operation and enforcing violations, and it should be so stipulated in the FLUP.	<p>monitoring guideline is not needed in the FLUP.</p> <p>After the FLUP is approved, a timber sale contract is prepared by DOF and signed by the purchaser. The contract stipulates the scope and nature of all actions that are appropriate on state land in connection with the purchase and removal of the timber.</p> <p>The DOF will monitor the timber sale through regular inspections and through additional “as needed” visits to the site to ensure compliance by the purchaser with all aspects of the contract.</p>
Cascadia	You deserve credit for the extensive work done in the field for this sale. However, wildlife and fish surveys don't seem adequate. Conditions at each site are what matters in the long run, so please facilitate all the necessary field surveys and monitoring (including by OHMP and ADF&G) necessary to protect riparian areas, nests and dens.	OHMP will be consulted for any stream crossing that occurs, and if they feel it necessary, they will visit the site. DOF will also encourage the wildlife biologists with ADFG to participate in our scarification plans.
	<b>Bonds</b>	
John Strassenburgh	Seventh, there is no discussion of performance bonds. Such bonds should be required, and stipulated in the FLUP, in amounts sufficient to fund the requirements of the Plan and contract.	Some of the detailed stipulations the DOF uses and enforces for timber sales are more appropriately detailed in the timber sale contract, not the FLUP. One such detail is the amount used for bonding, which is stipulated in the timber sale contract. The contract will contain bonding amounts proportional to the risks, as evaluated by the DOF.
	<b>Legal description</b>	
Becky Long	Regarding the legal description in the public notice, based on the maps, T25N R7W Sec.17 should be listed. I see on the maps no roads or units in T25N R7W Secs. 20, 24, 25, so why are they listed? And your maps don't show T25N R7W Secs 33-35 which are listed in the description.	<p>Change made. The DOF apologizes for the confusion regarding the legal description of the project. T25N R7W Sec.17 should have been listed, but was not. The 40 acres in that section that was proposed for harvest have been dropped from the sale.</p> <p>The DOF listed T25N R7W Sections 20, 24, 25, 33-35 because it wanted the public to be aware of concerns in the areas adjacent to the field-located units. The DOF is considering future harvest operations in these areas as described in the 2005 Five Year Schedule of Timber Sales (FYSTS). Separate notification will be given in the future when specific FLUPs for the areas are developed.</p>

	Comment filing dates	
Friends of Mat-Su	There seems to be some confusion in relation to comment periods ending and filing appeals. The public comment is due by November 14 <sup>th</sup> , but to be eligible to appeal, a person must submit comment by November 7 <sup>th</sup> . Which is it?	The DOF apologizes for the confusion regarding the submission of comments. The FLUP document should have stated that both deadlines were November 14, 2005. The DOF received comments regarding the sale until November 14, 2005. People who submitted comments on or before November 14, 2005 are eligible to appeal the decision.
John Strassenburgh	Third, I take issue with the fact that public comment is due by November 14 <sup>th</sup> , but to be eligible to appeal, a person must submit comment by November 7 <sup>th</sup> . In every other public comment structure of which I am aware, the comment deadline and the appeal deadlines correspond. Adding to the confusion is the one page legal notice that is posted on the Division of Forestry website ( <a href="http://www.dnr.state.ak.us/forestry/pdfs/05westpetersvillenotice.pdf">http://www.dnr.state.ak.us/forestry/pdfs/05westpetersvillenotice.pdf</a> ), which uses a deadline of November 14 <sup>th</sup> (rather than the 7 <sup>th</sup> as stated in the FLUP draft) as the comment deadline for eligibility for appeal. I can only conclude that this operation is on the fast track, and the public is viewed more as an obstacle to overcome than a meaningful participant in the process.	
	Alternatives	
Geoffrey Parker	The PD asserts that there are five alternatives, but lists only four.	Change made. The Final Finding has been changed to say “four alternatives.” The DOF apologizes for the confusion. The intent was to list four alternatives.
John Strassenburgh	First, Alternative Actions on page 12 states that there are 5 possible alternatives to consider, but only 4 are listed and explained. And there is no alternative that allows for modification of this proposal, other than to change its size. Don’t you think it reasonable to offer an alternative that considers changes, like increased buffers, requiring seed trees be islands of trees selected in advance by Division of Forestry personnel to ensure proper reforestation, requirements to obliterate roads rather than “closing” them, etc? Your alternatives are incomplete and exclude the logical option of modifying the substance (not just the size) of the proposal.	<p>The DOF views the options that you list as modifications to the alternative proposed, not a separate alternative. The DOF uses the best available information to reach an informed decision regarding the disposal of a State resource. The buffers designed in this sale meet the requirements of the <i>Susitna Forestry Guidelines</i> and the Alaska Forest Resources and Practices Act (FRPA).</p> <p>For responses to your comments about buffers, seed trees, reforestation, and road closure, please see these sections of this document, above:</p> <ul style="list-style-type: none"> <li>• Anadromous fish</li> <li>• Silvicultural prescriptions</li> <li>• Road closure and ATV use</li> <li>• Reforestation</li> </ul>



	<b>Incomplete</b>	
Ruth Wood	This document is poorly written, inaccurate and incomplete.	<p>Changes made. The Preliminary Decision FLUP document is a draft, and many changes were made to the FLUP in response to the comments made during this comment period.</p> <p>The FLUP is not the only document that guides DOF in its Mat-Su timber sale program. DOF is also guided by statutes, regulations, the Susitna Area Plan, and the <i>Susitna Forestry Guidelines</i>. The timber sale itself is formalized in a sale contract with the purchaser that is also separate from the FLUP. The FLUP would be quite long if it contained all the statutes, regulations, professional experience and contract language that the DOF applies to the proposed sale. The FLUP intent is to make it clear to the public and agencies that the DOF is selling a public resource, and that it has considered pertinent and key points that could affect the future public multiple uses of the land.</p>
	<b>Email problems</b>	
Several people	The email address did not work.	<p>DOF apologizes for the problems that some people experienced when using Rick Jandreau's email address for sending their comments. The problem was that the underscore between Rick's first and last names was covered up by the underline that Microsoft Word automatically places on an email address. The correct address will be the same for commenting on the Final Finding. <a href="mailto:rick_jandreau@dnr.state.ak.us">rick_jandreau@dnr.state.ak.us</a></p>

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